# BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268–0001

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POSTAL RATE COMMISSION OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

## RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORY OF ADVO, INC. (ADVO/USPS-4)

The United States Postal Service hereby provides its response to the following interrogatory of ADVO, Inc.: ADVO/USPS-4, filed on March 23, 2000. An objection was filed to ADVO/USPS-7, and responses to ADVO/USPS-2, 3, 5, 6, and 8 were filed previously.

The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr. Chief Counsel, Ratemaking

Richard T. Cooper

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 (202) 268–2992 Fax –5402 May 4, 2000

# RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORY OF ADVO. INC.

**ADVO/USPS-4.** For Foot deliveries made by city letter route carriers, please provide the most recent data (including that from any delivery redesign project) available on the following. Please also identify the source of all data.

- (a) The average volume and weight delivered on a relay.
- (b) A distribution of the total number of relays used to calculate (a) to the corresponding volumes and weights served. (The weighted average of volumes and weights per relay calculated from the distribution should equal the overall averages given in (a).)

#### **RESPONSE:**

- (a) The following information is available from the Engineered Standards

  Database provided by witness Raymond. (Please note the information requested in this question does not relate to the Work Sampling tallies provided to witness Baron.) The requested volume information is unavailable. The weight of mail delivered was not collected by relays. However, satchel weights were collected at the beginning of the relays on foot routes, loops for park and loop routes, and any other time the carrier used a satchel, as long as the data collector did not interfere with the carrier's duties. The average satchel weight collected was 11.3 pounds.
- (b) The following information is available from the Engineered Standards

  Database provided by witness Raymond. There were a total of 1270

  occurrences of the satchels being weighed. An electronic spreadsheet with

  all the satchel weights for each occurrence data collected will be provided shortly as a Library Reference.

### **CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

Richard T. Cooper

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