

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
WITNESS RAYMOND TO ADVO INTERROGATORIES
(ADVO/USPS-T13-104)

The United States Postal Service hereby provides the response of witness Raymond to the following interrogatories of Advo, Inc.: ADVO/USPS-T13-104, filed on March 23, 2000.

Each 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.
(202) 268-2993; Fax: -5402
Washington, D.C. 20260-1137
May 17, 2000

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO ADVO, INC. INTERROGRATORIES

ADVO/USPS-T13-104. On a curblin delivery, when a carrier had to dismount from his vehicle at a delivery to drop an accountable or parcel to an address, did the data collector identify that delivery type as a curblin or as a dismount?

RESPONSE:

In general the data collector recorded a carrier dismount from the vehicle to deliver a parcel or an accountable as a dismount type delivery. The Engineered Standards study was concerned with the work that is taking place at a delivery point. The work required to service a curblin type delivery with a dismount of the vehicle is significantly greater than servicing a curblin delivery from the vehicle. Our data thus has the advantage of allowing such dismounts to be accurately categorized with the STS category of Route/Access (FAT) Time.

DECLARATION

I, Lloyd B. Raymond, declare under penalty of perjury that the foregoing answers are true and correct to the best of my knowledge, information, and belief.

Lloyd B. Raymond

Date: 5-17-00

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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