

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-T13-110, 114)

The United States Postal Service hereby provides the response of witness Raymond to the following interrogatories of Advo, Inc.: ADVO/USPS-T13-110-114, filed on March 30, 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 22, 2000

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

ADVO/USPS-T13-110. Interrogatory MPA/USPS-T13-16 asked you to "identify the routes" that each data collector worked on during the survey. Your response provided observers (by observer code) and 4-digit route numbers. With respect to this response,

(a) Please confirm that 7 pairs of routes in the database (14 total routes) have identical 4-digit route codes but for different city and zip codes, and that your response lists two or more data collectors for each of these identical 4-digit route codes, but does not uniquely identify which observer(s) worked on which routes.

(b) Please confirm that it is impossible to determine from your response which observer(s) correspond to which of these routes.

(c) Please provide, in hardcopy and spreadsheet format, a revised response that includes city (CY codes) that will enable parties to "identify the routes" that each data collector worked on.

RESPONSE:

(a) Not Confirmed – I cannot confirm 7 pairs of routes in the entire ES database (14 total routes) have identical 4-digit route codes but for different city and zip codes. I found five pairs in Phase 1 pair and one in Phase 2. Confirmed that each route having identical 4-digit route codes relating different city and zip codes lists two or more data collectors. Not confirmed that the response to MPA/USPS-T13-16 does not uniquely identify which observer(s) worked on each route. See (b) below.

(b) Not Confirmed – It is possible to determine which observers correspond to which routes. The response to MPA/USPS-T13-16 provided observers (by observer code) and 4-digit route numbers. I admit, however, that for some routes it is unclear which city the route is located. Also see response to ADVO/USPS-T13-31.

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- (c) Please refer to library reference LR-378 for the updated database containing city (CY codes) and observer codes.

ADVO/USPS-T13-114. MPA/USPS-T13-60 requested, for each route day, the observer codes for all data collectors that collected data on that specific route day. Your response indicates that you have provided that information in response to MPA/USPS-T13-16.

(a) Please confirm that your response to MPA/USPS-T13-16 provides no CY codes or dates and does not provide sufficient data points to reflect all route days in your LR I-163 database.

(b) Please provide, in spreadsheet format, the observer codes for each data collector for each route day in LR I-163.

RESPONSE:

(a) Confirmed.

(b) A spreadsheet named ADVO114.xls is provided in LR-I-378, to be filed shortly.

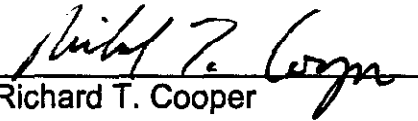
DECLARATION

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: 5.22.00

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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