

RECEIVED
MAY 24 4 38 PM '00
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Before The
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

Postal Rate and Fee Changes, 2000

Docket No. R2000-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE
WITNESS RAYMOND TO ADVO INTERROGATORIES
(ADVO/USPS-T13-137, 139)

The United States Postal Service hereby provides the response of witness Raymond to the following interrogatories of Advo, Inc.: ADVO/USPS-T13-137, 139, filed on April 18, 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 24, 2000

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO ADVO, INC. FOLLOW-UP INTERROGATORIES**

ADVO/USPS-T13-137. With reference to your response to USPS/ADVO-T13-23(b), please confirm, that to the best of your knowledge, the only comparison undertaken by the ES project team of how well the sampled routes reflected the universe of all city letter carrier routes at the time the samples were taken, was for the age and the gender of letter carriers. If this is incorrect, please give the details of other analyses.

RESPONSE:

Not Confirmed. As stated on many previous occasions, the Postal Service chose many of the sites, but the routes were selected at random. To obtain sufficient data on which to perform statistical analysis, the ES study continued selecting random routes until the data based on age and gender reached the levels of the national profile.

Other factors analyzed are included in my response to ADVO/USPS-T13-23 (b). The ES study also performed comparative analysis on the distribution of the USPS delivery types, the distribution of the USPS job classifications and the average mail volume per delivery. See also my response to ADVO/USPS-T13-139. The analysis has been made available for inspection under protective conditions.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO ADVO, INC. FOLLOW-UP INTERROGATORIES**

ADVO/USPS-T13-139. Advo interrogatory ADVO/USPS-T13-74 asked whether any data had been collected or analyses performed to identify the relative volume characteristics of the delivery units or routes in your study. Your response states that "there were many analyses performed on volume," and that "reports on these analyses are contained in 13 binders of reports" located at Merrifield, under protective conditions.

- (a) Do any of these analyses specifically compare the relative characteristics of delivery units or routes with high DPS volumes to those with average or low DPS volumes?
- (b) Do any of these analyses specifically compare the relative DPS and other volume characteristics, characteristics of sampled delivery units or routes with national averages for comparable periods?
- (c) Do any of these analyses specifically compare the observed quantity or type of volume per actual or possible delivery, per route (by type), or per delivery unit for your sampled routes with comparable data from any regional or national level set of actual or possible deliveries, routes, or delivery units?
- (d) If your answer to any of (a)-(c) is yes, please specifically identify, for each subpart, the specific documents at Merrifield that contain these analyses, including for each the document title or caption, binder number, and page references so that these specific documents can be readily identified and located.

RESPONSE:

- (a) No.
- (b) No.
- (c) Yes.
- (d) Binder #13 at the yellow tab.

Memorandum from Lloyd Raymond on 6/24/99.

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: 5-24-00

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

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
May 24, 2000