

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

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

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Postal Rate and Fee Changes, 2000

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Docket No. R2000-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
WITNESS RAYMOND TO INFORMATION REQUEST MADE AT HEARING  
(June 14, 2000)

Counsel for Advo, Inc. recently brought to the attention of the Postal Service that certain information relating to the Engineered Standards study conducted by witness Raymond was requested at hearing, but may not have been included in the information previously filed. See Tr. 18/80001. In order to ensure that this information has been provided, and that all such information requests have been fulfilled, undersigned counsel yesterday sent by email an electronic copy of the attached table to counsel for Advo, Inc. The United States Postal Service hereby formally files the response of witness Raymond to the information request. The request is restated and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

  
Richard T. Cooper

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Washington, D.C. 20260-1137  
June 14, 2000

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND  
TO ADVO, INC. INFORMATION REQUEST MADE AT HEARING**

**At Tr. 18/8001, Counsel for Advo, Inc. stated:**

**We had previously mentioned getting an electronic version of the witness's response to compelled interrogatory MPA-56.**

**It just occurred to me that that was one of those Library References that had data for only the 844 route days that were in Baron's database. It did not include information for these additional routes, and I would ask that the information, the electronic information that is going to be provided would provide that as well, that additional information as well.**

**RESPONSE:**

**A table similar to that provided in response to interrogatory MPA/USPS-T13-56, containing the requested additional routes, is attached.**

Date	Unit	Route	Tallies	First Scan	Last Scan	Total Time
22-May-97	CY02	1579	90	7:34:19	15:58:00	8:23:41
29-May-97	CY02	1579	1			
30-May-97	CY02	1579	1			
15-Oct-96	CY02	1595	135	6:37:31	18:22:28	11:44:57
12-Mar-98	CY04	4211	5	9:39:48	20:16:22	10:36:34
16-Nov-96	CY04	4214	75	6:33:01	13:46:35	7:13:34
28-Oct-96	CY04	4219	90	6:50:08	15:29:00	8:38:52
31-Oct-96	CY04	4223	88	8:11:20	17:00:09	8:48:49
29-Oct-96	CY04	4227	93	6:32:25	15:48:31	9:16:06
23-Aug-97	CY04	4234	43	7:21:57	12:54:08	5:32:11
21-Feb-98	CY04	4239	70	6:39:48	13:30:24	6:50:36
30-Oct-96	CY04	4242	87	6:32:38	14:59:46	8:27:08
3-Jul-97	CY04	4243	90	7:08:01	15:29:13	8:21:12
10-Mar-98	CY04	4265	13	10:56:46	12:08:11	1:11:25
11-Mar-98	CY04	4265	29	15:34:10	18:16:48	2:42:38
17-Dec-97	CY04	4906	119	8:04:06	19:21:57	11:17:51
14-Jan-98	CY04	4906	86	6:34:40	16:13:16	9:38:36
15-Jan-98	CY04	4906	75	6:37:57	13:59:36	7:21:39
15-Jan-98	CY04	4908	25	14:06:25	17:47:06	3:40:41
5-Feb-98	CY04	4908	99	6:40:56	15:31:08	8:50:12
9-Feb-98	CY04	4908	28	13:55:46	16:38:35	2:42:49
9-Dec-97	CY04	4909	91	6:42:27	17:08:07	10:25:40
17-Jan-98	CY04	4909	88	7:06:47	16:16:09	9:09:22
3-Feb-98	CY04	4909	78	7:09:04	15:43:02	8:33:58
10-Dec-97	CY04	4910	21	8:00:50	9:56:04	1:55:14
19-Dec-97	CY04	4910	98	5:41:32	19:29:17	13:47:45
28-Jan-98	CY04	4910	98	6:18:22	18:25:01	12:06:39
4-Feb-98	CY04	4910	105	6:38:30	16:59:10	10:20:40
23-Feb-98	CY04	4910	14	12:37:08	13:49:19	1:12:11
20-Dec-97	CY04	4915	87	6:34:29	15:58:03	9:23:34
23-Jan-98	CY04	4915	103	6:34:26	17:31:30	10:57:04
8-Dec-97	CY04	4917	109	6:14:28	17:59:15	11:44:47
21-Jan-98	CY04	4917	97	6:44:02	17:44:05	11:00:03
6-Feb-98	CY04	4917	98	6:31:01	16:43:16	10:12:15
20-Feb-98	CY04	4917	19	14:44:51	16:31:53	1:47:02
24-Jan-98	CY04	4920	38	11:30:01	15:07:16	3:37:15
26-Jan-98	CY04	4920	83	6:29:44	15:35:26	9:05:42
31-Jan-98	CY04	4920	95	6:17:19	16:52:24	10:35:05
13-Dec-97	CY04	4926	98	7:01:57	17:10:26	10:08:29
22-Jan-98	CY04	4926	107	6:06:21	18:02:54	11:56:33
20-Jan-98	CY04	4931	102	6:37:39	17:42:11	11:04:32
24-Jan-98	CY04	4940	47	6:55:18	11:21:04	4:25:46
2-Feb-98	CY04	4940	108	6:11:26	17:44:58	11:33:32
16-Dec-97	CY04	4944	108	6:33:28	17:28:34	10:55:06
12-Jan-98	CY04	4944	1			
29-Jan-98	CY04	4944	89	6:38:32	16:39:01	10:00:29
27-Jan-98	CY04	4945	83	6:42:43	16:11:38	9:28:55
25-Oct-96	CY06	7519	64	7:21:31	13:54:16	6:32:45
29-Oct-96	CY06	9302	69	7:38:30	14:40:27	7:01:57
26-Oct-96	CY06	9303	78	7:04:50	14:17:56	7:13:06
18-Oct-96	CY07	8061	115	6:01:20	17:07:00	11:05:40

31-Oct-96	CY11	4732	89	8:07:16	16:52:26	8:45:10
21-Oct-96	CY11	4811	97	7:35:31	17:03:22	9:27:51
5-Nov-96	CY14	3704	65	7:58:55	14:18:52	6:19:57
7-Nov-96	CY14	3705	86	7:03:04	15:23:59	8:20:55
4-Feb-97	CY14	3705	83	7:05:44	15:32:44	8:27:00
8-Nov-96	CY17	1906	95	7:31:48	17:01:50	9:30:02
9-Nov-96	CY17	1970	74	7:33:26	15:25:21	7:51:55
13-Nov-96	CY18	2912	92	7:03:23	15:29:56	8:26:33
6-Feb-97	CY18	2934	87	7:37:03	16:05:00	8:27:57
12-Nov-96	CY18	2947	95	7:01:38	16:18:18	9:16:40
16-Nov-96	CY19	4846	58	7:18:18	12:44:32	5:26:14
15-Nov-96	CY19	4876	76	6:49:44	14:15:39	7:25:55
9-Nov-96	CY20	5546	77	7:08:20	14:34:36	7:26:16
14-Nov-96	CY20	5553	82	7:01:13	16:07:36	9:06:23
4-Feb-97	CY20	5553	94	7:04:12	16:31:23	9:27:11
13-Nov-96	CY20	5566	103	7:04:54	16:59:46	9:54:52
15-Nov-96	CY21	6229	92	7:08:08	16:53:45	9:45:37
20-Nov-96	CY21	6234	82	7:04:04	15:36:45	8:32:41
18-Nov-96	CY21	6248	84	7:04:54	15:52:00	8:47:06
19-Nov-96	CY21	6288	79	7:08:38	15:15:24	8:06:46
4-Nov-96	CY22	5414	81	7:08:10	15:30:08	8:21:58
6-Nov-96	CY22	5416	92	7:07:18	16:29:03	9:21:45
5-Nov-96	CY22	5420	85	7:12:15	16:41:51	9:29:36
7-Nov-96	CY22	5433	77	7:06:57	14:50:11	7:43:14
6-Jan-97	CY23	0211	70	7:31:27	15:52:20	8:20:53
7-Jan-97	CY23	0218	82	7:31:53	15:52:28	8:20:35
8-Jan-97	CY23	0222	89	7:28:45	17:44:22	10:15:37
11-Jan-97	CY23	0401	85	7:33:44	16:13:33	8:39:49
10-Jan-97	CY23	0414	95	7:29:24	16:57:07	9:27:43
9-Jan-97	CY23	0433	91	7:33:44	16:42:56	9:09:12
5-Dec-96	CY32	3507	92	7:31:02	16:45:53	9:14:51
4-Dec-96	CY32	3522	80	7:33:43	15:18:36	7:44:53
6-Dec-96	CY32	3543	97	7:34:51	17:05:11	9:30:20
12-Feb-97	CY42	0429	65	3:07:42	9:45:56	6:38:14
11-Feb-97	CY43	0163	60	6:18:37	12:33:11	6:14:34
12-Feb-97	CY44	3127	55	6:05:09	11:25:53	5:20:44
13-Feb-97	CY44	3133	81	5:35:28	13:32:14	7:56:46
11-Feb-97	CY45	5405	81	7:07:13	15:49:36	8:42:23
5-May-97	CY46	1133	86	7:06:21	15:51:24	8:45:03
10-May-97	CY46	1133	74	6:35:36	15:24:46	8:49:10
12-May-97	CY46	1133	85	7:06:21	16:13:26	9:07:05
15-May-97	CY46	1133	90	7:01:32	15:54:42	8:53:10
17-May-97	CY46	1133	91	7:03:05	16:01:28	8:58:23
18-Jul-97	CY46	1145	35	7:06:21	10:12:59	3:06:38
19-Jul-97	CY46	1145	93	6:01:56	16:19:29	10:17:33
25-Jul-97	CY46	1145	90	7:05:20	16:33:15	9:27:55
3-Jun-97	CY46	1148	84	7:03:11	15:29:26	8:26:15
4-Jun-97	CY46	1148	89	6:55:23	15:32:36	8:37:13
11-Jun-97	CY46	1148	77	7:11:38	14:19:14	7:07:36
13-Jun-97	CY46	1148	66	7:08:16	14:40:43	7:32:27
14-Jun-97	CY46	1148	93	7:10:44	16:17:07	9:06:23
19-Jun-97	CY46	1148	94	7:10:42	17:16:18	10:05:36

5-May-97	CY47	1411	119	7:19:28	16:47:14	9:27:46
12-May-97	CY47	1411	85	7:24:20	14:53:01	7:28:41
13-May-97	CY47	1411	104	7:22:39	17:13:41	9:51:02
14-May-97	CY47	1411	105	7:22:35	17:07:42	9:45:07
15-May-97	CY47	1411	109	7:17:07	17:08:44	9:51:37
21-May-97	CY47	1411	92	7:19:31	16:30:59	9:11:28
23-May-97	CY47	1411	84	7:20:15	17:10:49	9:50:34
24-May-97	CY47	1411	93	7:19:24	17:07:36	9:48:12
27-May-97	CY47	1411	110	6:36:03	17:12:07	10:36:04
28-May-97	CY47	1411	103	7:18:54	17:57:13	10:38:19
29-May-97	CY47	1411	103	7:14:46	16:41:05	9:26:19
2-Jul-97	CY47	1475	1			
17-Jul-97	CY47	1475	109	7:00:46	18:23:39	11:22:53
24-Jul-97	CY47	1475	103	7:04:55	16:37:29	9:32:34
5-Sep-97	CY47	1507	83	7:03:42	15:24:27	8:20:45
12-Sep-97	CY47	1507	62	6:59:49	11:18:44	4:18:55
2-Jun-97	CY47	1508	102	7:17:03	17:21:17	10:04:14
3-Jun-97	CY47	1508	97	7:19:25	16:52:45	9:33:20
5-Jun-97	CY47	1508	83	7:23:49	17:19:02	9:55:13
6-Jun-97	CY47	1508	81	7:16:39	15:44:22	8:27:43
7-Jun-97	CY47	1508	77	7:28:57	15:01:36	7:32:39
9-Jun-97	CY47	1508	95	7:19:15	16:42:23	9:23:08
11-Jun-97	CY47	1508	66	7:23:14	14:07:51	6:44:37
12-Jun-97	CY47	1508	94	7:23:42	16:02:34	8:38:52
14-Jun-97	CY47	1508	94	7:06:29	15:37:02	8:30:33
19-Jun-97	CY47	1508	66	7:05:38	13:29:28	6:23:50
26-Jun-97	CY47	1508	110	7:13:18	17:04:44	9:51:26
27-Jun-97	CY47	1508	92	7:07:02	15:49:01	8:41:59
28-Jun-97	CY47	1508	74	6:36:48	13:51:25	7:14:37
18-Aug-97	CY47	1586	70	7:06:47	13:44:51	6:38:04
23-Aug-97	CY47	1586	84	7:24:17	16:28:34	9:04:17
17-May-97	CY48	0337	83	7:33:59	15:00:26	7:26:27
7-May-97	CY49	0101	89	7:05:28	17:30:53	10:25:25
2-Jun-97	CY50	8701	72	7:07:39	12:57:53	5:50:14
3-Jun-97	CY50	8701	1			
5-May-97	CY50	8717	96	7:03:52	16:24:35	9:20:43
6-May-97	CY50	8717	103	6:59:34	17:00:45	10:01:11
7-May-97	CY50	8717	84	6:49:31	14:25:34	7:36:03
19-May-97	CY50	8717	101	6:56:15	16:55:48	9:59:33
20-May-97	CY50	8717	52	7:05:34	11:36:00	4:30:26
28-May-97	CY50	8717	102	7:00:16	17:10:00	10:09:44
21-Jul-97	CY50	8735	109	7:11:18	16:44:29	9:33:11
22-Jul-97	CY50	8735	109	7:25:29	16:58:05	9:32:36
23-Jul-97	CY50	8735	106	7:08:52	16:18:09	9:09:17
30-Jul-97	CY50	8759	86	7:17:54	15:35:38	8:17:44
4-Aug-97	CY50	8759	105	7:21:36	16:42:38	9:21:02
18-Aug-97	CY50	8759	68	10:04:29	16:12:49	6:08:20
19-Aug-97	CY50	8759	91	7:09:23	15:07:25	7:58:02
30-May-97	CY51	6419	97	7:33:24	17:25:51	9:52:27
31-May-97	CY51	6419	91	7:57:11	18:03:10	10:05:59
6-Jun-97	CY52	1111	71	8:12:57	15:46:09	7:33:12
7-Jun-97	CY52	1111	89	6:39:25	15:23:33	8:44:08

14-Jun-97	CY52	1121	57	6:27:31	12:58:57
17-Dec-97	CY53	0374	25	14:03:47	16:21:57
28-Jun-97	CY53	2215	83	6:39:19	15:28:37
20-Jun-97	CY53	2227	83	6:33:22	15:06:15
14-Jul-97	CY58	8212	97	7:37:37	16:34:54
11-Jul-97	CY60	1917	93	7:34:42	16:11:30
14-Jul-97	CY61	4271	52	9:29:19	14:38:40
26-Jul-97	CY61	4273	86	7:05:58	15:27:02
11-Aug-97	CY63	0825	90	6:49:09	15:22:27
13-Nov-97	CY66	0106	90	7:48:10	16:08:58
14-Jan-98	CY66	0256	1		

6:31:26  
2:18:10  
8:49:18  
8:32:53  
8:57:17  
8:36:48  
5:09:21  
8:21:04  
8:33:18  
8:20:48

**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: 6-13-00

**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  
June 14, 2000