

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

INTERROGATORIES OF ADVO, INC. TO ASSOCIATION OF  
ALTERNATE POSTAL SYSTEMS WITNESS WHITE (ADVO/AAPS-T1-17-18)

Pursuant to sections 25 and 26 of the Rules of Practice, Advo, Inc. (Advo) directs the following interrogatories to Association of Alternate Postal Systems witness White.

Respectfully submitted,

  
\_\_\_\_\_  
John M. Burzio  
Thomas W. McLaughlin  
Burzio & McLaughlin  
1054 31st Street, N.W.  
Washington, D. C. 20007  
Counsel for ADVO, INC.

CERTIFICATE OF SERVICE

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

  
\_\_\_\_\_  
Thomas W. McLaughlin

June 19, 2000

## ADVO, INC. INTERROGATORIES TO AAPS WITNESS WHITE

ADVO/AAPS-T1-17. Please refer to the example you cite at page 25 of your testimony concerning the effect on your costs of an increase in weight of a TMC product from 7-1/2 ounces to 8 ounces. With respect to this example, please provide the following:

- (a) Please provide all calculations and state all assumptions used in concluding that this change required your carriers to make two additional restocking trips and to walk an extra half-to-one-mile each delivery day.
- (b) What was the average number of total deliveries per route for DSO carriers prior to this weight change?
- (c) What was the average number of walking "loops" per route for DSO carriers prior to this weight change?
- (d) What was the average number of deliveries per walking loop for DSO carriers prior to this weight change?
- (e) What was the average satchel weight per loop (the weight of delivery materials in the satchel at the start of the loop) for DSO carriers prior to this weight change?
- (f) Explain how, and by how much, each of (b)-(e) above changed as a result of the example you cite?

ADVO/AAPS-T1-18. Please refer to the example you cite at page 25 of your testimony concerning the effect on your costs of an increase in weight of a TMC product from 7-1/2 ounces to 8 ounces. You state that the TMC delivery in question was "address specific products, so not every household was delivered." You also state that "we increased the delivery charge to the customer."

- (a) Please identify, by TMC product name and publisher, the TMC product in question.
- (b) What was the delivery charge to the customer on a per piece basis before, and after, this change?