

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C.

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POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

RESPONSE OF SATURATION MAIL COALITION WITNESS  
GIULIANO TO QUESTION RAISED AT THE HEARING

The Saturation Mail Coalition hereby submits the attached response of SMC witness Giuliano to a question posed by counsel for Val-Pak at the hearing on August 29th. The delay in responding was due to the vacation schedule of the employee responsible for the requested information. A declaration of Mr. Giuliano will be filed tomorrow.

Respectfully submitted,



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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

September 5, 2000

RESPONSE OF SMC WITNESS GIULIANO TO QUESTION RAISED AT THE HEARING

QUESTION: At Tr. 19055, Mr. Olson asked for the average route size for Advo's private delivery operations.

RESPONSE:

In the market in question, Advo's private delivery routes are based on groupings of postal carrier routes. Because private delivery can be accomplished more quickly than postal delivery, almost all of the carriers cover more than one postal route and many cover three or more routes. The average number of deliveries per carrier is 1,200.