

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D. C. 20268-0001

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POSTAL RATE AND FEE CHANGES, 1997

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY
Docket No. R97-1

INTERROGATORIES OF ADVO, INC.
TO UNITED STATES POSTAL SERVICE WITNESS
MICHAELA NELSON (ADVO/USPS-T19-1-9)

Pursuant to sections 25 and 26 of the Rules of Practice, Advo, Inc. (Advo) directs the following interrogatories to United States Postal Service witness Michael A. Nelson. If the witness is unable to respond to any interrogatory, we request that a response be provided by appropriate USPS witness capable of providing an answer.

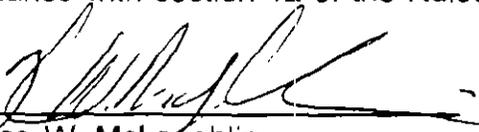
Respectfully submitted,



John M. Burzio
Thomas W. McLaughlin
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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

August 14, 1997

Interrogatories of ADVO, Inc. to USPS Witness Nelson (USPS-T-19)

ADVO/USPS-T19-1. In regard to Library Reference H-151, please provide the full working definitions (as used in the survey) of:

- (a) Deviation stop.
- (b) Routine walking loop.
- (c) Routine dismount.

ADVO/USPS-T19-2. Referring to your workpaper 1.2:

- (a) Are the units in columns 3 and 4 weighted stops from the Motorized Letter Route Survey - Street Form? If not, please describe the units and identify their source.
- (b) Please provide a cross-walk between the Street Form and the Activities in your workpaper 1.2 (*i.e.*, line items in the form go into each of the activities on the workpaper).

ADVO/USPS-T19-3. Referring to your workpaper 1.10, please identify the specific source (line number, page, and library reference or workpaper) of the data in each column.

ADVO/USPS-T19-4. Referring to your workpaper 1.11, please explain how it was used to develop the factors in Alexandrovich's worksheet 7.0.4.1, lines 7a, 7b, and 8a.

ADVO/USPS-T19-5. Referring to your workpaper 1.14, please provide the following:

- (a) Sources for all the data.
- (b) Units in columns 2 and 3.
- (c) Description of how dismounts were identified as being due to volume/weight.
- (d) Description of how loops were identified as being due to volume/weight.

ADVO/USPS-T19-6. Referring to your workpaper 1.14, please define and describe the response categories for discounts and explain the logic for each's separate categorization:

- (a) NCDBU
- (b) Parcels
- (c) Distance between del. points
- (d) Safety
- (e) Terrain
- (f) School bldgs.
- (g) Office bldgs/business
- (h) Apts
- (i) Other
- (j) No curbside del.

ADVO/USPS-T19-7. Referring to your workpaper 1.14, please define and describe the response categories for loops and explain the logic for each's separate categorization:

- (a) Improves performance
- (b) Numerous discounts
- (c) Lite volume
- (d) Safety
- (e) Separate streets
- (f) No curbside del
- (g) NDCBU
- (h) Other
- (i) Line of travel
- (j) Deliveries across the street
- (k) Apts

ADVO/USPS-T19-8. Referring to your workpaper 1.14, please explain the logic for placing the data for "line of travel" and "deliveries across the street" loops in the third column (rather than the second column).

ADVO/USPS-T19-9. Referring to your workpaper 1.14, please explain the logic associated with the variables chosen to calculate variability.