BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D. C. 20268-0001
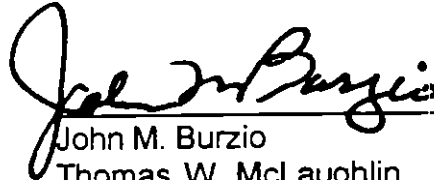
POSTAL RATE AND FEE CHANGES, 1997   :   Docket No. R97-1

INTERROGATORIES OF ADVO, INC.
TO THE UNITED STATES POSTAL SERVICE
(ADVO/USPS-1-3)

Pursuant to sections 25 and 26 of the Rules of Practice, Advo, Inc. (Advo) directs

the following interrogatories to the United States Postal Service.

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

August 20, 1997

ADVO/USPS-1.   Library Reference H-109, pages 4 and 5, identifies LR H-106 as the source for column 6. Please identify the specific pages and line numbers in H-106 which provide those numbers or demonstrate fully how they were calculated.

ADVO/USPS-2.   Please refer to Library Reference H-106.

(a)   Please confirm that footnote 5 on pages II-5, III-5, and IV-5 of Library Reference H-106 should read ". . . from PVI-5."

(b)   Please confirm that the figures on pages II-4, III-4, and III-4 were calculated using the appropriate PVI-5 factors.

(c)   If you cannot confirm, please explain how these figures were calculated and why this method was used, or provide corrected calculations using the appropriate method.

ADVO/USPS-3.   Please refer to Library Reference 109.

(a)   On Table 1 for Regular ECR letters and Table 1 for non-letters, does "no key" mean that there were no direct tallies, and that costs in "no-key" pools were distributed to Regular ECR only through the mixed mail/overhead distribution keys?

(b)   If so, explain how there can be costs allocated to Regular ECR even though there are no direct ECR tallies.

(c)   If not, please explain what "no key" means, how costs were calculated and distributed, and why this approach is appropriate.