

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

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

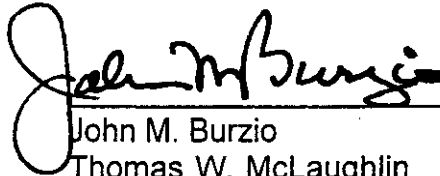
POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

INTERROGATORIES OF ADVO, INC.  
TO UNITED STATES POSTAL SERVICE WITNESS  
THOMAS HARAUSH (ADVO/USPS-T5-11-12)

Pursuant to sections 25 and 26 of the Rules of Practice, Advo, Inc. (Advo) directs the following interrogatories to United States Postal Service witness Thomas Haraush. 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  
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

December 3, 2001

ADVO, INC. INTERROGATORIES TO USPS WITNESS THOMAS HARAUSH

ADVO/USPS-T5-11. With respect to boxholder volume and delivery point sequence/sector segment (DPS/SS) volume on rural routes,

- (a) Please fully explain how the National Mail Count (NMC) and Rural Carrier Cost System (RCCS) clearly distinguish between boxholder letters and DPS/SS pieces.
- (b) Please fully explain how the USPS ensures that the NMC and RCCS consistently apply the definitions of boxholder and DPS/SS.

ADVO/USPS-T5-12. Are simplified address letters on rural routes ever DPS/SS'd?

- (a) If so, please fully explain how the NMC and RCCS distinguish between simplified address letters that are boxholder and those that have been DPS/SS'd.
- (b) If so, please fully explain how the USPS ensures that the NMC and RCCS consistently apply the definitions of boxholder and DPS/SS to simplified address letters.