

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

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POSTAL RATE AND FEE CHANGES, 1997

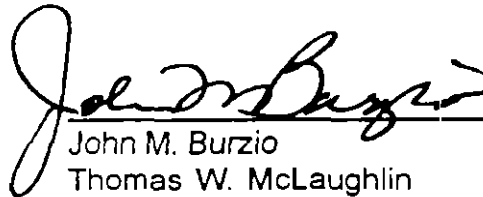
SEP 17 4 12 PM '97

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

INTERROGATORIES OF ADVO, INC.
TO UNITED STATES POSTAL SERVICE WITNESS
WILLIAM TAKIS (ADVO/USPS-T41-6-8)

Pursuant to sections 25 and 26 of the Rules of Practice, Advo, Inc. (Advo) directs the following interrogatories to United States Postal Service witness William M. Takis. If the witness is unable to respond to any interrogatory, or if another witness is better able to respond, we request that a response be provided by an appropriate USPS witness best able to provide an answer.

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 17, 1997

ADVO, INC. INTERROGATORIES TO USPS WITNESS TAKIS (USPS-T-41)

ADVO/USPS-T41-6. At page 57 of his testimony (USPS-T-14), witness Bradley states:

"A fourth reason why a variability may differ from one is the way in which the activity is used in the mail flow. In some cases, a particular activity may be used as a 'gateway' activity. This means that the activity serves as an early recipient of mail in the mail flow. As such, it must be up and running and ready to receive mail as it comes into the stream. For example, the canceling activity serves as a gateway activity for mail flowing through all of the sorting technologies. In this activity, the mail is faced and canceled before it is set [sic] to other activities for sorting throughout the evening."

Do you agree that the "gateway" nature of the facer/canceler activity explains, at least in part, its relatively low volume variability (65.4 percent)? If not, please explain why you disagree with witness Bradley and what you believe to be the explanations for this relatively low volume variability.

ADVO/USPS-T41-7. At page 59 of his testimony (USPS-T-14), witness Bradley states that "[s]imilarly, the variability for the canceling activity reflects its pivotal role and [sic] the primary gateway activity for each night's sorting." At page 57, Bradley states that "[m]uch mail processing must be done within strict time limits set by dispatch times."

- (a) Do you agree that the canceling activity plays a "pivotal role" as "the primary gateway activity for each night's sorting"? If not, please explain why you disagree with witness Bradley and what relative role you believe the canceling operation plays in preparing for each night's sorting activities.
- (b) Is the staffing of personnel in the facer/canceler operation affected in any way by the fact that nearly all of the volume processed in this operation is First Class Mail? Explain your answer.
- (c) Do First Class delivery standards, or efforts by management to achieve high delivery performance or meet performance targets for First Class Mail, play any part in staffing decisions for this operation? Explain your answer.

- (d) Is the staffing of personnel in the facer/canceler operation affected in any way by the need to process First Class mail within strict time limits to meet critical dispatch times? Explain your answer.

ADVO/USPS-T41-8. Witness Bradley also cites volume peaking patterns as a factor that may affect volume variability (see, e.g., his statement on volume peaking characteristics in platform activities, USPS-T-14 at 62). With respect to the facer/canceler operation:

- (a) Do volumes entering the facer/canceler operation exhibit any peaking characteristics? Please generally describe the peaking patterns by tour and, within tours, by time of day.
- (b) Does the fact that originating First Class Mail comprises nearly all of the volume entering the facer/canceler operation have any effect on peaking patterns in this operation? In your response, please generally describe the peaking patterns of originating First Class Mail, and describe the extent to which First Class volumes cause or contribute to peaking patterns in this operation.