BEFORE THE POSTALRATECOMMISSION WASHINGTON, D. C. 20268-0001

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POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

POSTAL RATE COMMISSION OFFICE OF THE SECRETARY

INTERROGATORIES OF ADVO, INC. TO THE UNITED STATES POSTAL SERVICE (ADVO/USPS-20-25)

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

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

September 16, 1997

INTERROGATORIES OF ADVO INC. TO THE UNITED STATES POSTAL SERVICE

ADVO/USPS-20. Please provide a copy of the "Delivery Encyclopedia" referred to on page 11 of USPS LR-H-236.

ADVO/USPS-21. For the two models identified in Exhibits 1 and 2 of USPS LR-H-236, please provide the following:

- (a) Documentation and description of the model.
- (b) Average value for each variable used in the model.

ADVO/USPS-22. Is the basic purpose of the facer/canceler operation to (i) assimilate and face loose mail into proper "face up" address orientation, and (ii) place cancellation marks on stamped mail? If not, please describe the basic purposes of this operation.

ADVO/USPS-23. Other than non-precanceled stamped mail and single-piece metered mail, is any other kind of mail (e.g., bulk metered mail, bulk permit imprint mail, bulk precanceled stamped mail, etc.) processed through facer/canceler operations?

- (a) If so, please identify the specific kinds of such mail (subclasses, categories, preparation characteristics) that are so processed.
- (b) For each kind of mail in (a), explain specifically whether and why it <u>requires</u> processing through the facer/canceler operation.
- (c) If any kinds of mail listed in (a) do not require processing through the facer/canceler operation but are nevertheless so processed, explain why.

ADVO/USPS-24. Please confirm the following:

- (a) Bulk Rate Standard A mail must be prepared by mailers and presented to the Postal Service in presorted bundles or trays with the mail properly faced.
- (b) Postage for Bulk Rate Standard A mail may only be paid by permit imprint, meter, or precanceled stamps; the use of uncanceled stamps is not permitted.

If you cannot confirm, please describe the circumstances (including citations to the Domestic Mail Manual) where mailers are allowed to present Bulk Rate Standard A mail in an unpresorted or loose, unfaced manner, or to use uncanceled stamps.

ADVO/USPS-25. Do any of the following kinds of Bulk Rate Standard A mailngs require either facing or cancellation by the Postal Service?

- (a) Bulk rate Standard A mail with postage paid by permit-imprint ;
- (b) Bulk rate Standard A mail with metered postage;
- (c) Bulk rate Standard A mail with postage paid by precanceled stamp.

If so, for each of the above categories, (i) describe the circumstances and the specific characteristics of the mailings that would require facing or cancellation, and (ii) quantify or estimate the percentage of the total mail volume in each category (either numerically or qualitatively) that requires either facing or cancellation.