

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

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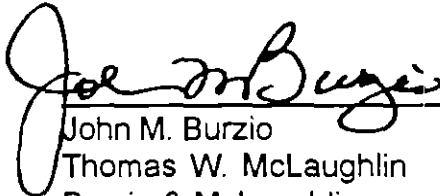
POSTAL RATE AND FEE CHANGES, 1997

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

INTERROGATORIES OF ADVO, INC.
TO UNITED STATES POSTAL SERVICE WITNESS
WILLIAM M. TAKIS (ADVO/USPS-T41-1)

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, 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

September 16, 1997

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

ADVO/USPS-T41-1. Please refer to Section IV., page A 2, of your workpapers. For the facer/canceler operation cost pool ("CANCEL"), please confirm that:

- (a) First Class Letters and Cards account for 88.9 percent of the total volume variable costs of the facer/canceler operation cost pool;
- (b) First Class Letters and Cards plus Single-Piece Third Class Mail account for 89.4 percent of the total volume variable costs;
- (c) First Class Mail, Single-Piece Third Class Mail, and Priority Mail account for 92.9 percent of the total volume variable costs.
- (d) Third Class Bulk Rate Mail (Regular plus Nonprofit, but excluding Single Piece mail) accounts for 2.6 percent of the total volume variable costs.

If you cannot confirm, please provide the correct figures and identify their source.