

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, DC 20268-0001

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POSTAL RATE AND FEE CHANGES  
PURSUANT TO PUBLIC LAW 108-18

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Docket No. R2005-1

INTERROGATORIES OF ADVO INC. TO UNITED STATES POSTAL  
SERVICE WITNESS DENNIS STEVENS (ADVO-USPS-T15-1-8)

(May12, 2005)

Pursuant to sections 25 and 26 of the Rules of Practice, ADVO, Inc. (Advo) directs the following interrogatories to United States Postal Service witness Dennis Stevens (USPS-T-15). 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,

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## ADVO, INC. INTERROGATORIES TO USPS WITNESS DENNIS STEVENS

**ADVO/USPS-T15-1.** Please refer to LR-K-79, MDCD.SCAN6. Explain the distinctions, if any, in the following and how they were used to track individual sampled times to the specific cost pools in COSTPOOL2.FINAL and MDCD.CPSUM.FINAL.

- (a) Between TRAVEL and TOFROM.
- (b) Between off-clock and off-street.
- (c) Between DELIVERY DDTRAVEL and DDTRAVEL DELIVERY.
- (d) Between DELIVERY NETWORK and NETWORK DELIVERY

**ADVO/USPS-T15-2.** Referring again to MDCD.SCAN6, please explain why the following four scans are considered Prep and how one can determine that the carrier was clocked onto Street prior to the “administrative” interruption:

- 63 – 18 Clock off Lunch – Clock to Street
- 100 – 18 Clock off Break – Clock to Street
- 117 – 18 Clock off Emergency – Clock to Street
- 124 - 18 Clock off Other – Clock to Street.

**ADVO/USPS-T15-3.** Referring again to MDCD.SCAN6, please explain the following scan times, whether there were actually some scans of this nature, and, if they were used, how they were used to track individual sampled times to specific cost pools in COSTPOOL2.FINAL and MDCD.CPSUM.FINAL.

- 25 – 56 Leave Office – Arrive Office (NA)
- 49 – 18 Clock Off Street – Clock to Street (NONSTRT)
- 63 – 32 Clock off Lunch – Clock to Lunch (SPLIT)
- 100 – 70 Clock off Break – Clock to Break (SPLIT)
- 117 – 87 Clock off Emergency – Clock to Emergency (SPLIT)
- 124 – 94 Clock off Other – Clock to Other (SPLIT)

**ADVO/USPS-T15-4.** Referring again to MDCD.SCAN6, please use some examples to explain how the cost pool assignments were made for:

- Splits
- Delivery Section NA
- Delivery Network and Network Delivery

- DDTravel Delivery

**ADVO/USPS-T15-5.** On page 3 of your testimony, you state that 9.7% of the scanned time came from “invalid or error scans.”

- (a) How much time (in hours and minutes) and how many scans does this figure represent?
- (b) What was the proportion of scan pairs that was deemed invalid or erroneous?
- (c) Please identify the top ten types of invalid scans along with the number of times they occurred and the amount of time they represent.
- (d) Has the USPS determined how to avoid so many invalid or error scans for future data collections? If so, please explain.
- (e) Does the USPS have plans to conduct a new CCSTS in the future?

**ADVO/USPS-T15-6.** Please refer to MDCDCWEIGHTS.MASKZIPS.DATA in LR-K-78. In combination with page 2 of the text of LR-K-79, it appears that, for the 167 sampled zips, there are:

- 28 zip codes with less than eleven city letter routes
  - 131 zip codes with more than ten but less than sixty-one (city) letter routes
  - 8 zip codes with more than sixty (city) letter routes.
- (a) Please confirm that these are the correct figures for the data used to develop MDCD.CPSUM.FINAL.XLS. If this is not correct, please provide the correct information.
  - (b) Were all routes and route-day data collected used to develop the MDCD.CPSUM.FINAL.XLS result (other than “invalid or error” scan times)? If not, please explain why.
  - (c) Please provide the crosswalk between the MASKZIP code identifiers found in LR-K-79 and the unique zip identifiers used by witness Bradley in LR-K-81.

**ADVO/USPS-T15-7.** If not already provided, please provide any other final CCSTS instruction manuals or guides or other hard-copy materials that were used by trainers, postmasters/supervisors, and/or carriers to determine how to collect the scan or volume data.

**ADVO/USPS-T15-8.** For all final data files given to witness Bradley, please confirm the following or if not able to confirm, please explain:

- (a) All time and volume data for all city letter routes (including city phantom routes) in each zip were included for each sampled day.
- (b) Zip volume data for each day included only volume carried out to the street by city carriers that day and included volume in bulk/direct deliveries.
- (c) Only the time and volume data for sampled city letter routes were included.