

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

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

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: Docket No. R2005-1
:
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INTERROGATORIES OF ADVO INC. TO UNITED STATES POSTAL
SERVICE WITNESS NANCY KAY (ADVO-USPS-T18-1)

(May16, 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 Nancy Kay (USPS-T-18). 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 NANCY KAY

ADVO/USPS-T18-1. LR-K-71 states that the input data for your Rural Carrier Mail Count Data come from two sources. FY2003.RURFLAT.dat is a text file containing the rural carrier mail count evaluation for each route as of FY 2003 PQ 4. It contains 69,318 observations. FY2004.RURFLAT.dat is a text file containing the rural carrier mail count evaluation for each route as of FY 2004 PQ 4. It contains 70,212 observations.

- (a) The USPS FY04 Annual Report states that there were 61,611 full-time rural carriers in FY03 and 62,762 full-time rural carriers in FY04. Your two data files appear to be a 100% census of all National Mail Count data taken in each of the two years. If this is not correct, please explain fully.
- (b) What portion of total rural carriers was counted in FY03 and FY04?
- (c) Please state when the National Mail Count shape and processing/handling definitions changed to be consistent with those of the DMM/RPW.
- (d) Please identify the time periods over which the FY03 and FY04 National Mail Counts were taken.