

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
:

INTERROGATORIES OF ADVO INC. TO UNITED STATES POSTAL
SERVICE WITNESS THOMAS HARAUSH (ADVO-USPS-T5-1-2)

(May18, 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 Thomas Harahush (USPS-T-5). 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 THOMAS HARAUSH

ADVO/USPS-T5-1. Please refer to the table attached to this document. It is derived from the data in witness Meehan's base year spreadsheets. It shows an apparent large mismatch between National Mail Count percentages of non-DPS/SS letters vs. DPS letters and between flats and boxholders. Can you explain these mismatches?

ADVO/USPS-T5-2. Referring to LR USPS-K-12 description of the first stage sampling for RCCS, please provide the following information;

- (a) For each USPS geographic region, total number of rural routes in each of the first stage sampling stratum and total number of rural routes sampled in each stratum.
- (b) For each USPS geographic region, total number of rural route days in each of the first stage sampling stratum and total number of rural route days sampled in each stratum.
- (c) A description, including some estimate of geographic size, of a "District."
- (d) For each USPS geographic region, total number of Districts in each first stage sampling stratum and total number of Districts in each stratum where rural routes were sampled.

Attachment to Interrogatory ADVO-USPS-T5-1

	National Mail Count Volume Results				RCS Results		RCS Total W/ NMC %s (7)**	Diff (8) = (7) - (5)
	Eval Rts 92.12%	Other Rts 7.88%	Average Weekly Vol	Percentage Avg Wk Vol	RCS (5)	% RCS (6)		
	(1)	(2)	(3)*	(4)				
Letters	7,848	4,312	7,570	25.4%	10,493,597	20.2%	13,175,137	2,681,539
Flats	7,045	3,103	6,734	22.6%	13,020,637	25.1%	11,720,910	(1,299,727)
Parcels	452	218	434	1.5%	738,118	1.4%	754,958	16,840
Boxholders	1,826	809	1,746	5.9%	2,037,468	3.9%	3,038,180	1,000,713
DPS	13,572	4,923	12,891	43.2%	25,117,386	48.4%	22,436,538	(2,680,848)
SS	414	671	434	1.5%	474,311	0.9%	755,794	281,483
Totals	31,157	14,036	29,808	100.0%	51,881,517	#####	51,881,517	0

* Column(3) = .9212 * Column(1) + .0788 * Column(2)
** Column(7) = Column(5) Total * Column(6)

Sources: LR USPS-K-5, CS10.xls, Inputs and Inputs DK
Payroll weights for Eval and Oth Rts are 92.12% and 7.88%