

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

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

Docket No. R2005-1

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS HARAHUSH  
TO INTERROGATORY OF ADVO, INC.  
(ADVO/USPS-T5-2)  
(June 1, 2005)

The United States Postal Service hereby provides the response of witness Harahush to the following interrogatory of Advo, Inc., filed on May 18, 2005: ADVO/USPS-T5-2. Contemporaneously filed ADVO/USPS-T5-1 was redirected to witness Kay for response.

The interrogatory is stated verbatim and is followed by its response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

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**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.

**RESPONSE:**

(a-b) See the table below. The data below are from Q4 FY 2004. For an explanation of the two strata, see Selecting the First-Stage Sample in USPS-LR-K12/R2005-1.

District	District Name	Stratum	Sampled		Routes in		Route Days	
			in 1C	in 2C	1C	2C	1C	2C
6	CARIBBEAN	1C	1	0	38	0	2,926	0
18	MASSACHUSETTS	1C	15	0	616	0	47,432	0
28	SE NEW ENGLAND	1C	15	0	597	0	45,969	0
30	NEW HAMPSHIRE	1C	23	0	933	0	71,841	0
40	MAINE	1C	14	0	599	0	46,123	0
60	CONNECTICUT	1C	19	0	784	0	60,368	0
70	NORTHERN NEW JERSEY	1C	6	0	257	0	19,789	0
80	SOUTH JERSEY	1C	16	0	643	0	49,511	0
88	CENTRAL NEW JERSEY	1C	10	0	408	0	31,416	0
105	WESTCHESTER	1C	13	0	493	0	37,961	0
117	LONG ISLAND	1C	3	0	146	0	11,242	0
120	ALBANY	1C	27	0	1096	0	84,392	0
140	WESTERN NEW YORK	1C	17	0	722	0	55,594	0
150	PITTSBURGH	1C	12	0	482	0		0

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							37,114	
164	ERIE CENTRAL	1C	18	0	770	0	59,290	0
170	PENNSYLVANIA	1C	32	0	1322	0	101,794	0
190	PHILADELPHIA METRO	1C	15	0	594	0	45,738	0
200	CAPITAL	1C	7	0	293	0	22,561	0
210	BALTIMORE	1C	26	0	1024	0	78,848	0
220	NORTHERN VIRGINIA	1C	15	0	635	0	48,895	0
230	RICHMOND	1C	27	0	1148	0	88,396	0
250	APPALACHIAN	1C	28	0	1169	0	90,013	0
270	GREENSBORO	1C	42	0	1812	0	139,524	0
280	MID-CAROLINAS	1C	45	0	1826	0	140,602	0
290	GREATER SO. CAROLINA	1C	35	0	1443	0	111,111	0
300	ATLANTA	1C	51	0	2105	0	162,085	0
310	SOUTH GEORGIA	1C	30	0	1254	0	96,558	0
320	NORTH FLORIDA	1C	32	0	1351	0	104,027	0
327	CENTRAL FLORIDA	1C	19	0	829	0	63,833	0
330	SOUTH FLORIDA	1C	4	0	164	0	12,628	0
335	SUNCOAST	1C	41	0	1725	0	132,825	0
350	ALABAMA	1C	44	0	1863	0	143,451	0
370	TENNESSEE	1C	61	0	2526	0	194,502	0
390	MISSISSIPPI	1C	29	0	1227	0	94,479	0
400	KENTUCKIANA	1C	38	0	1575	0	121,275	0
430	COLUMBUS	1C	23	0	977	0	75,229	0
440	NORTHERN OHIO	1C	22	0	902	0	69,454	0
450	CINCINNATI	1C	25	0	1024	0	78,848	0
460	GREATER INDIANA	1C	43	0	1766	0	135,982	0
480	ROYAL OAK	1C	15	0	605	0	46,585	0
481	DETROIT	1C	11	0	460	0	35,420	0

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493	GREATER MICHIGAN	1C	42	0	1706	0	131,362	0
500	HAWKEYE	1C	29	0	1182	0	91,014	0
530	LAKELAND	1C	40	0	1636	0	125,972	0
553	NORTHLAND	1C	50	0	2053	0	158,081	0
570	DAKOTAS	1C	20	0	809	0	62,293	0
590	BIG SKY	1C	5	0	220	0	16,940	0
600	NORTHERN ILLINOIS	1C	16	0	688	0	52,976	0
604	CENTRAL ILLINOIS	1C	27	0	1162	0	89,474	0
630	GATEWAY	1C	35	0	1502	0	115,654	0
640	MID-AMERICA	1C	37	0	1505	0	115,885	0
680	CENTRAL PLAINS	1C	35	0	1425	0	109,725	0
700	LOUISIANA	1C	27	0	1101	0	84,777	0
720	ARKANSAS	1C	25	0	1079	0	83,083	0
730	OKLAHOMA	1C	29	0	1156	0	89,012	0
752	DALLAS	1C	36	0	1515	0	116,655	0
760	FORT WORTH	1C	25	0	1014	0	78,078	0
770	HOUSTON	1C	23	0	985	0	75,845	0
780	RIO GRANDE	1C	32	0	1316	0	101,332	0
800	COLORADO-WYOMING	1C	22	0	879	0	67,683	0
840	SALT LAKE	1C	8	0	330	0	25,410	0
852	ARIZONA	1C	22	0	987	0	75,999	0
870	ALBUQUERQUE	1C	7	0	277	0	21,329	0
890	NEVADA-SIERRA	1C	6	0	240	0	18,480	0
900	LOS ANGELES	2C	0	2	0	9	-	693
913	VAN NUYS	1C	8	0	338	0	26,026	0
920	SAN DIEGO	1C	12	0	488	0	37,576	0
926	SANTA ANA	1C	4	0	168	0	12,936	0
940	SAN FRANCISCO	1C	4	0	145	0	11,165	0

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945	BAY-VALLEY	1C	6	0	281	0	21,637	0
956	SACRAMENTO	1C	26	0	1032	0	79,464	0
967	HONOLULU	1C	2	0	86	0	6,622	0
970	PORTLAND	1C	21	0	860	0	66,220	0
980	SEATTLE	1C	23	0	944	0	72,688	0
990	SPOKANE	1C	17	0	676	0	52,052	0
995	ALASKA	2C	0	3	0	18	-	1386

- (c) The District Name in the table above gives a description of the district. The number of routes in each stratum in each district gives an estimate of the geographic size of the district.
- (d) Assuming that the district is the geographic region, there is only one district in each geographic region and only one district in each stratum in the geographic region.