

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

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

:
:
: Docket No. R2005-1
:

INTERROGATORIES OF ADVO INC. TO UNITED STATES POSTAL
SERVICE WITNESS NANCY KAY (ADVO-USPS-T18-2-3)

(June 10, 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-T18-2. In response to ADVO/USPS-T18-1, you identify the numbers of evaluated, auxiliary and mileage routes for the FY03 and FY04 rural data files.

- (a) For each year, should those numbers add up to the total observations in each file? If so, there appears to be a disparity for FY04 – 62,773, 77,727, and 12 add up to 70,512, not 70,212. Please confirm or correct these figures.

- (b) Please confirm that the routes in each of those two data files are the sum total of rural routes in the system in those years. If not, please explain.

ADVO/USPS-T18-3. In response to ADVO/USPS-T5-1, you note that the ADVO attempt to determine total year NMC volume results was inaccurate. Please provide your version of the most accurate way to consolidate the PQ 1-3 and PQ 4 evaluated route and other route results to estimate total year NMC volume results. Also, please document the weighting procedure you use to arrive at that estimate.