

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 JOHN KELLEY (ADVO-USPS-T16-2-5)

(June 17, 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 John Kelley (USPS-T-16). 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 JOHN KELLEY

ADVO/USPS-T16-2. There are 164 zips in the OCA-t15.4.d Concordance data but 167 in MDCD.Weights.Maskzips.Data. Also, in response to OCA/USPS-T16-2, witness Kelley states that, of the 167 zip codes in the final sample, two were excluded from USPS-LR-K-79 and K-81 scan-time files and from K-80 and K-81 volume files. A third zip was included in LR K-79 scan-time file and used in MDCD.CPSUM.FINAL.XLS but was excluded from K-81 scan-time file and K-80 and K-81 volume files. Please confirm that the two masked zips that were excluded from MDCD.CPSUM.FINAL.xls calculations and from the data given to Dr. Bradley are 2018.7 in stratum 3 and 2017.5 in stratum 1. If this is incorrect, please provide the masked zip numbers and their strata.

ADVO/USPS-T16-3. Please confirm the following understanding or make the necessary corrections:

- (a) 167 zips were sampled and are included in MDCD.Weights.Maskzips.Data.
- (b) 165 zips were used to create MDCD.CPSUM.FINAL.xls.
- (c) 164 zips are included in the LR USPS K-81 Scan-Time Files
- (d) 145 zips are included in witness Bradley's LF regression data set

ADVO/USPS-T16-4. Using the OCA-t15.4.d Concordance data sheet, please add the total number of city letter routes by route delivery mode (as used in MODE for the timepool data given to witness Bradley), in each zip.

ADVO/USPS-T16-5. Please provide the number of routes by route delivery mode (as used in MODE for the timepool data given to witness Bradley), in each of the three zip strata.