

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 THE
UNITED STATES POSTAL SERVICE
(ADVO/USPS-1-10)

(August 19, 2005)

Pursuant to sections 25 and 26 of the Rules of Practice, ADVO, Inc.

(Advo) directs the following interrogatories to the United States Postal Service for the purpose of preparing rebuttal testimony.

Respectfully submitted,

John M. Burzio

Thomas W. McLaughlin

Counsel for ADVO, INC.

1054 31st Street, N.W., Suite 540
Washington, D.C. 20007-4403
(202) 965-4555; Fax (202) 965-4432
burziomclaughlin@covad.net

ADVO, INC. INTERROGATORIES TO USPS

ADVO/USPS-1. The USPS now requires that most if not all saturation letters be automation-compatible with barcodes. With respect to that requirement, please provide:

- (a) The postal regulations covering this requirement.
- (b) The date on which those regulations were implemented.

ADVO/USPS-2.

- (a) What are the USPS policies or management guidelines on the circumstances when automation-compatible saturation letters destined for city routes are run through DPS automation. If none are available, provide any generalizations possible concerning these conditions and how decisions to DPS saturation letters are made.
- (b) If the response to (a) above differs depending upon whether the saturation letters are entered at the DDU or at another facility, please explain fully the differences.

ADVO/USPS-3. With respect to saturation letter mailings entered at the DDU:

- (a) Are some of them still transported back to the SCF for DPS processing? If so, please explain fully the conditions when that is done.

- (b) Please provide all information available on the proportion of saturation DDU letters that are transported back to the SCF for DPS processing.

ADVO/USPS-4. With respect to the decision to DPS saturation letter mailings:

- (a) For saturation letters that are entered by the mailer at the destination SCF or further upstream, is the decision whether to DPS the mailing at the plant made by plant managers at the SCF or by carrier supervisors at the DDU? Please explain.
- (b) For saturation letters entered by the mailer at the DDU, is the decision whether to transport those letters back to the DSCF for DPS processing made by the carrier supervisors at the DDU or by the managers at the DSCF? Please explain.

ADVO/USPS-5. The following questions relate to decisions by plant managers or supervisors on whether and how to DPS a saturation letter mailing that is received at a destination SCF (i.e., a saturation mailing that is entered by the mailer at the destination SCF or further upstream).

- (a) Does the USPS ever break up the mailing so that it only DPSs the pieces that go to certain type of routes (e.g., foot or park-and-loop) and then transfers the remainder of the mailing to the DDU for delivery as either cased or sequenced (extra-bundle) mail? Please explain.
- (b) Does the USPS ever break up the mailing so that it only DPSs the pieces that go to certain types of delivery sections on the various routes (e.g., foot or park-and-loop) and then transfers the remainder of the mailing to the DDU for delivery as either cased or sequenced (extra-bundle) mail? Please explain.

- (c) Explain whether and how plant personnel would know which portions of addresses in the mailing should be pulled and segregated from a saturation letter mailing for separate DPS processing, and describe the process by which those address portions would be pulled and separately handled for DPS processing (e.g., the process and time spent looking up address schemes by delivery method, physically pulling sections of addresses from the mailing, transferring of the pulled sections to DPS equipment, and any re-traying of the remaining non-DPSed portions of the mailing for transportation to the delivery units).
- (d) At the destination SCF, is it more practical for a saturation letter mailing to (i) be split into parts for selective DPS processing of specific address sections by route type or delivery method, with the remainder of the mailing bypassing DPS processing, or (ii) be processed intact with the entire mailing either being DPSed or cross-docked for transportation directly to the delivery units?

ADVO/USPS-6. What are the USPS policies or management guidelines on the circumstances, or any generalizations as to when:

- (a) Non-DPS saturation letters are cased by city carriers. If the response depends on the type of city carrier route or type of delivery sections, or on the characteristics of the mailing, please explain.
- (b) Non-DPS saturation letters are sequenced (carried out as extra bundles/trays) by city carriers. If the response depends on the type of city carrier route or type of delivery sections, or on the characteristics of the mailing, please explain.

ADVO/USPS-7. Is it correct to say that city carriers try to take out all saturation flat mailings as extra bundles/trays? Please explain.

ADVO/USPS-8. Is it correct to say that, if city carriers have too much saturation flat mail to deliver as extra bundles/trays in one day, they will, rather than case it, defer some of that mail to be delivered another day as extra bundles/trays? Please explain fully.

ADVO/USPS-9.

- (a) Are there certain types of non-DPS saturation letters that are more efficiently cased rather than handled as sequenced (or extra bundle) mail by city carriers? Please explain.
- (b) If the response to (a) above depends on the type of route or delivery section, or on the characteristics of the mailing or the mail piece, please explain fully.

ADVO/USPS-10. Do city carriers sometimes collate saturation letters with saturation flats in order to produce an "extra bundle" to take to the street? Please explain.