

DOCKET SECTION

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Docket No. R97-1

POSTAL RATE AND FEE CHANGES, 1997

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF ADVO, INC.
AND MOTION FOR ITS LATE ACCEPTANCE
(ADVO/USPS-30)

The United States Postal Service hereby provides the response to the following interrogatory of Advo, Inc.: ADVO/USPS-30, filed on October 10, 1997. The interrogatory is stated verbatim and is followed by the response.

The Postal Service additionally asks that this response be accepted today, four days (two business days) out of time. Because of some confusion in determining the appropriate personnel to respond to the discovery request, and due to the participation of the majority of the Postal Service's Finance Department in training last week, the response could not be prepared until today. The Postal Service regrets this delay, and will fax a copy of the response to counsel for Advo this afternoon in order to mitigate any prejudice that it may have caused.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


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November 3, 1997

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF ADVO**

ADVO/USPS-30. Please refer to the response to ADVO/USPS-5a., which asked for information on average number of possible deliveries for each city carrier route type for FY94, FY95, and FY96. The response provides data on total annual possible deliveries rather than average by route type.

- a. Please provide the number of routes by route type for FY94, FY95, and FY96 in a format similar to that used in the response to ADVO/USPS-5a.
- b. For each route type listed in the response, please provide a description of the route type (e.g., motorized business letter route).

RESPONSE:

- a. Shown below are estimated numbers of routes by carrier route type, obtained from the Carrier Cost System.

<u>Route Type</u>	<u>FY94</u>	<u>FY95</u>	<u>FY96</u>
1500	1,626	1,763	1,754
1502	1,580	1,585	1,638
1506			12
1540	16,440	16,869	16,298
1551	149	167	52
1552	493	488	453
1557	1,280	1,232	1,261
1560	93,358	93,315	92,822
1562	29,446	29,718	29,633
1571	3,963	3,434	3,784
1573	1,483	1,535	1,462
1575	325	242	260
1620	549	586	581
1640	7,214	7,354	7,328
1642	813	788	821
1720			58
1730	298	310	244
1740	11		
1770	264	222	260

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b. The description of each route type is given below.

<u>Route Type</u>	<u>Description</u>
1500	Business 1-Trip Foot Regular
1502	Business 1-Trip Motorized Regular
1506	Business 2-Trip Motorized Regular
1540	Residential Foot Regular
1551	Business 1-Trip Foot Auxiliary
1552	Business 1-Trip Motorized Auxiliary
1557	Residential Foot Auxiliary
1560	Residential Park & Loop Regular
1562	Residential Curb Regular
1571	Residential Park & Loop Auxiliary
1573	Residential Curb Auxiliary
1575	Mixed Park & Loop Auxiliary
1620	Mixed Foot Regular
1640	Mixed Park & Loop
1642	Mixed Curb Regular
1720	Business 2-Man Foot Regular
1730	Business 3-Man Foot Regular
1740	Business 4-Man Foot Regular
1770	Residential 2-Man Foot Regular

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.


Anne B. Reynolds

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