

ADVO, INC. INTERROGATORIES TO USPS WITNESS TALMO (USPS-T-27)

ADVO/USPS-T27-1. Please provide a version of USPS-LR-L-84 (in spreadsheet format) that breaks out the following:

(a) BY and TY DAL mail processing costs associated with ECR/NECR saturation flats (by cost pools).

(b) BY shape by density level mail processing costs (for each cost pool) associated with direct tallies, mixed mail tallies, and not handling tallies.

ADVO/USPS-T27-2. Please explain:

(a) Why USPS-LR L-55 is not used to develop the ECR/NECR mail processing costs by cost pools, shapes, and rate categories.

(b) Why USPS-LR-L-84 uses Fortran programs rather than SAS programs.

ADVO/USPS-T27-3. Please identify each instance where the LR-L-84 distribution keys allocating total ECR/NECR mail processing costs among the three density-related rate categories differ from those in LR-L-55 used to allocate total mail processing costs among the subclasses and shapes.

ADVO/USPS-T27-4. Please explain how “counted mixed mail” mail processing tallies by shape are distributed among the three density-related categories of ECR/NECR.

ADVO/USPS-T27-5. Please explain why the costs and volumes of High Density and Saturation rate categories are combined in your LR-L-84 analysis.