



## INTERROGATORIES OF ADVO, INC. TO USPS WITNESS KIEFER (USPS-T-36)

**ADVO/USPS-T36-1.** USPS witness Kelley in response to VP/USPS-T30-3 provided DAL volume data for the two-month period of March-April 2006. That data shows that for ECR High Density Non-Letters entered at the DDU, 7.0 percent used DALs.

- a. Please confirm that under Domestic Mail Manual Section 602.4.1, DALs are permitted to be used only for saturation flat mailings, merchandise samples, and Bound Printed Matter, not for high-density flat mailings.
- b. Notwithstanding the above DMM provision, are DALs used by any ECR High Density flat mailers, such as newspaper “total market coverage” programs mailed to nonsubscribers?
- c. Of the 7 percent of High Density Non-Letters entered at the DDU, what proportion are flats?
- d. Please confirm that under the Postal Service’s proposed rate schedule (Attachment A, page 21 of the USPS’s Request), the proposed surcharge for DALs, as currently worded, would apply only to “Saturation Rate pieces addressed using detached address labels (DALs).”
- e. Is it the Postal Service’s intent that only saturation-rate pieces, which are authorized to use DALs, should be subject to the DAL surcharge, but that non-saturation high density-rate pieces should be exempt from the surcharge. If so, please explain the Postal Service’s rationale.