

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, DC 20268-0001

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POSTAL RATE AND FEE CHANGES, 2006

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Docket No. R2006-1

INTERROGATORIES OF ADVO INC. TO OFFICE OF CONSUMER  
ADVOCATE WITNESS JED SMITH (ADVO-OCA-T3-1-5)

(September 20, 2006)

Pursuant to sections 25 and 26 of the Rules of Practice, ADVO, Inc. (Advo) directs the following interrogatories to Office of Consumer Advocate witness Jed Smith (OCA- 3). If the witness is unable to respond to any interrogatory, we request that a response be provided by appropriate OCA witness capable of providing an answer.

Respectfully submitted,

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John M. Burzio

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ADVO, INC. INTERROGATORIES TO OCA WITNESS SMITH (OCA-T-3)

**ADVO/OCA-T3-1.** On page 3 (lines 2 through 10) of your testimony, you criticize the CCSTS data. Please provide the following (including any related machine-readable programs, data sets and results):

- (a) Description and results of all statistical or logical tests you performed on the CCSTS data themselves.
- (b) Description and results of all variations of data cleaning, elimination, corrections, adjustments, etc. you performed on the CCSTS data themselves.

**ADVO/OCA-T3-2.** Please provide descriptions, tests and results of all econometric analyses performed with CCSTS data sets other than the data sets used by USPS witness Bradley, including any machine-readable programs, analytical results, and new data sets that you used.

**ADVO/OCA-T3-3.** Please provide all CCSTS econometric models and results you ran other than the ones presented in your testimony and OCA-LR-L-4. Please include any related machine-readable programs, data sets and results.

**ADVO/OCA-T3-4.** For the DOIS data and model results, please provide:

- (a) Description and results of all statistical and logical tests you performed on the DOIS data themselves.
- (b) Description and results of all variations of data cleaning, elimination, corrections, adjustments, etc. you performed on the DOIS data themselves.

**ADVO/OCA-T3-5.** Please provide descriptions, tests and results of all econometric analyses performed with DOIS data sets other than the data sets used in the development of the 12 models you present in Table 4 of your testimony and in OCA-LR-L-4, including any machine-readable programs, analytical results, and new data sets that you used.