

DOCKET SECTION

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

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POSTAL RATE AND FEE CHANGES, 1997  
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Nov 14 3 41 PM '97

DOCKET NO. R97-1  
OFFICE OF THE SECRETARY

INTERROGATORIES OF ADVO, INC.  
TO UNITED STATES POSTAL SERVICE WITNESS  
THOMAS W. HARA HUSH (ADVO/USPS-ST49-1)

Pursuant to sections 25 and 26 of the Rules of Practice, Advo, Inc. (Advo) directs the following interrogatories to United States Postal Service witness Thomas W. Harahush. If the witness is unable to respond to any interrogatory, we request that a response be provided by appropriate USPS witness capable of providing an answer.

Respectfully submitted,



John M. Burzio  
Thomas W. McLaughlin  
Burzio & McLaughlin  
1054 31st Street, N.W.  
Washington, D. C. 20007  
Counsel for ADVO, INC.

CERTIFICATE OF SERVICE

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

  
Thomas W. McLaughlin

November 14, 1997

**ADVO, INC. INTERROGATORIES TO USPS WITNESS HARA HUSH (USPS-ST-49)**

**ADVO/USPS-ST49-1. Please confirm the following. If you cannot, please explain fully what the values used in the base year workpapers do represent.**

- (a) The number of actual stops, possible stops, and pieces by shape and delivery characteristic (accountability, collections), route type and stop type generated from the City Carrier System and used in the USPS base year workpapers (USPS-T-5, WP B-7) are total FY96 values for the USPS system.**
- (b) The Rural Carrier System number of pieces by the various characteristics and subclasses identified and used as distribution keys in the USPS base year workpapers (USPS-T-5, WP B-10) are total FY96 values for the USPS system.**