

# DOCKET SECTION

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

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POSTAL RATE COMMISSION  
DOCKET NO. R97-11  
OFFICE OF THE SECRETARY

RESPONSE OF UNITED STATES POSTAL SERVICE  
WITNESS NIETO TO INTERROGATORY OF  
THE FLORIDA GIFT FRUIT SHIPPERS ASSOCIATION  
(FGFSA/USPS-T2-12(C))

The United States Postal Service hereby provides the response of witness Nieto to the following interrogatory of the Florida Gift Fruit Shippers Association: FGFSA/USPS-T2-12(c), filed on September 3, 1997. An objection to this subpart had been filed on September 15, 1997. After consultation with the witness, the Postal Service has determined that the burden inherent in producing the requested data, the basis for the objection, was surmountable and the information has been provided.

Counsel for the Postal Service provided this response to counsel for Florida Gift Fruit Shippers at hearings yesterday, but, because of her presence at hearings all day, was unable to file this information until today.

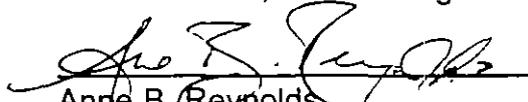
The subpart is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

  
Anne B. Reynolds

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October 15, 1997

**RESPONSE OF POSTAL SERVICE WITNESS NIETO TO INTERROGATORIES  
OF FLORIDA GIFT FRUIT SHIPPERS ASSOCIATION**

**FGFSA/USPS-T2-12.**

Please confirm that TRACS data are used to estimate on a quarterly basis the percentage of capacity utilized with respect to the four different highway accounts.

- a. Confirm that the TRACS data for the highway capacity utilization factors for FY 1995 is accurately reflected in the following table.

(TABLE WAS OMITTED)

- b. Provide a similar table showing the highway capacity utilization factors for FY96.
- c. Provide comparable capacity utilization data for each of the FYs from 1990 through 1994.

**Response to FGFSA/USPS-T2-12.**

- a. Answer filed September 18, 1997.
- b. Answer filed September 18, 1997.
- c. Please refer to the attached table on the following page.

RESPONSE OF POSTAL SERVICE WITNESS NIETO TO INTERROGATORIES  
OF FLORIDA GIFT FRUIT SHIPPERS ASSOCIATION

Response to FGFS/USPS-T2-12  
Attachment 1

**TRACS Historical Highway Capacity Utilization Factors FY90-FY94**

	FY 1990	FY 1991				FY 1992				FY 1993				FY 1994			
	PQ1*	PQ1	PQ2	PQ3	PQ4												
<b>Intra-SCF</b>	<b>49.7%</b>	<b>42.7%</b>	<b>40.9%</b>	<b>42.7%</b>	<b>39.5%</b>	<b>43.6%</b>	<b>41.7%</b>	<b>38.3%</b>	<b>39.8%</b>	<b>42.1%</b>	<b>38.4%</b>	<b>38.3%</b>	<b>38.0%</b>	<b>43.4%</b>	<b>38.4%</b>	<b>38.0%</b>	<b>39.3%</b>
Test Conducted At:																	
Inbound SCF	38.5%	47.8%	45.9%	45.3%	43.8%	50.7%	40.8%	40.3%	39.7%	48.5%	48.0%	42.1%	40.5%	40.3%	42.4%	45.1%	44.3%
Inbound Other	39.7%	36.0%	35.9%	58.3%	45.1%	38.6%	40.1%	32.8%	47.8%	27.3%	28.4%	29.3%	42.4%	41.7%	40.6%	39.7%	34.8%
Outbound SCF	58.0%	58.5%	49.3%	46.7%	49.1%	52.3%	52.3%	49.9%	42.3%	55.9%	42.6%	53.1%	42.7%	59.5%	49.8%	48.7%	42.9%
Outbound Other (a.m.)	84.8%	42.8%	39.4%	40.4%	34.5%	44.8%	41.0%	37.3%	40.3%	42.4%	39.3%	36.2%	33.6%	49.7%	36.6%	36.0%	40.2%
Outbound Other (p.m.)		30.3%	33.9%	22.7%	24.9%	31.8%	34.2%	31.3%	29.1%	36.5%	35.7%	30.9%	30.9%	25.8%	22.4%	22.8%	34.8%
<b>Inter-SCF</b>	<b>55.9%</b>	<b>54.6%</b>	<b>47.0%</b>	<b>53.6%</b>	<b>52.1%</b>	<b>47.8%</b>	<b>50.7%</b>	<b>45.7%</b>	<b>47.1%</b>	<b>46.6%</b>	<b>48.7%</b>	<b>50.7%</b>	<b>56.2%</b>	<b>45.7%</b>	<b>46.4%</b>	<b>50.2%</b>	<b>44.4%</b>
Test Conducted At:																	
BMC	64.8%	67.4%	47.5%	60.6%	68.8%	48.8%	53.2%	45.3%	49.8%	55.5%	48.7%	44.9%	72.6%	38.3%	42.3%	63.3%	48.4%
SCF	57.0%	55.7%	52.6%	50.5%	49.9%	52.8%	51.0%	49.0%	47.4%	48.1%	50.0%	53.8%	50.0%	55.6%	50.9%	49.7%	48.0%
Other	45.9%	40.6%	40.8%	49.6%	37.7%	41.9%	48.0%	42.8%	44.2%	36.3%	49.5%	53.7%	46.0%	45.1%	46.0%	37.8%	36.8%
<b>Intra-BMC</b>	<b>55.2%</b>	<b>60.5%</b>	<b>57.1%</b>	<b>51.8%</b>	<b>54.0%</b>	<b>57.5%</b>	<b>56.2%</b>	<b>56.5%</b>	<b>55.1%</b>	<b>56.7%</b>	<b>64.4%</b>	<b>58.4%</b>	<b>53.9%</b>	<b>55.6%</b>	<b>55.0%</b>	<b>57.3%</b>	<b>62.6%</b>
Test Conducted At:																	
BMC	43.7%	43.5%	44.1%	37.9%	38.0%	43.1%	42.5%	40.7%	39.5%	42.4%	40.3%	40.4%	41.9%	43.0%	42.0%	40.8%	42.5%
Inbound SCF	60.3%	56.7%	68.8%	55.7%	59.0%	61.1%	63.1%	60.8%	59.4%	55.8%	66.4%	61.8%	53.9%	61.6%	57.9%	53.8%	70.2%
Inbound Other	50.9%	58.3%	41.1%	48.7%	51.4%	63.5%	52.3%	50.8%	58.3%	61.7%	80.1%	60.0%	58.7%	49.3%	42.3%	55.7%	68.0%
Outbound SCF	72.5%	74.1%	73.6%	65.8%	76.4%	79.2%	72.5%	70.4%	72.2%	79.1%	76.9%	80.9%	70.0%	67.7%	71.7%	76.6%	66.0%
Outbound Other	48.6%	69.8%	58.2%	50.9%	45.4%	40.8%	50.5%	59.8%	48.3%	44.4%	58.3%	49.1%	45.2%	56.6%	61.0%	59.3%	64.5%
<b>Inter-BMC</b>	<b>75.5%</b>	<b>78.8%</b>	<b>82.7%</b>	<b>71.4%</b>	<b>66.2%</b>	<b>72.0%</b>	<b>74.9%</b>	<b>71.2%</b>	<b>66.5%</b>	<b>69.0%</b>	<b>71.7%</b>	<b>76.5%</b>	<b>74.8%</b>	<b>66.6%</b>	<b>76.5%</b>	<b>68.2%</b>	<b>68.7%</b>
Test Conducted At:																	
BMC	72.7%	72.7%	68.8%	66.3%	69.3%	69.9%	69.0%	63.7%	62.7%	69.1%	64.2%	71.3%	66.6%	68.8%	69.4%	68.9%	62.7%
SCF	68.9%	74.2%	69.3%	73.0%	65.4%	67.7%	71.7%	71.4%	66.0%	69.8%	72.2%	73.8%	74.1%	59.7%	72.3%	69.9%	72.8%
Other	84.9%	89.4%	50.0%	75.0%	63.7%	78.4%	83.9%	78.4%	70.8%	68.0%	78.6%	84.4%	83.8%	73.5%	87.9%	65.9%	70.6%

\* Only PQ1 available for FY90.

DECLARATION

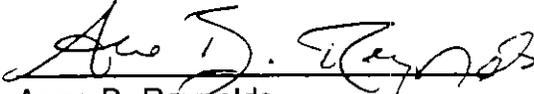
I, Norma B. Nieto, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

Norma B. Nieto

Dated: 10/13/97

**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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October 15, 1997