

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

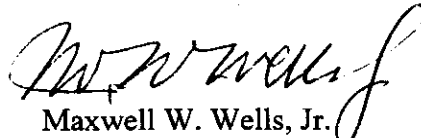
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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY**

DOCKET NO. R2000-1

POSTAL RATE AND FEE CHANGES, 2000

**INTERROGATORIES OF FLORIDA GIFT FRUIT SHIPPERS
ASSOCIATION TO USPS WITNESS PLUNKETT (FGFSA/USPS-T-36 -1-5)**

Pursuant to Section 20 of the Commission's Rules of Practice, Florida Gift Fruit Shippers Association (FGFSA) submits the attached interrogatories and document requests to USPS Witness Plunkett, USPS-T-36



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Attorney for Florida Gift Fruit
Shippers Association

Dated: March 23, 2000

FGFSA/USPS-T-36 - 1. On page 13, you state that the rate for each piece of parcel post includes two cents per pound for weight-related nontransportation handling cost.

- a. Identify the costs which are included as "weight-related nontransportation handling cost".
- b. Identify any study which specifies and quantifies "weight-related nontransportation costs".
- c. Provide the amount of "weight-related nontransportation costs".
- d. Provide a complete explanation of the method you used to determine that two cents per pound is the proper amount to cover such costs.
- e. Identify the additional handling and costs to support and justify a rate element of 80 cents for a 40 pound parcel, but which amount to only 20 cents for a 10 pound parcel.
- f. Do you agree that it would be more appropriate to describe these additional handling costs as being size or cube related, rather than weight related? If you do not agree, please fully explain.
- g. If the two cents per pound covers the "weight related nontransportation handling costs" for an Inter-BMC parcel. For Intra-BMC and DBMC parcels there is less handling than for the Inter-BMC parcel. Explain why the same rate element applies to all three rate categories.

FGFSA/USPS-T-36 - 2. Refer to your Attachment G. Transportation cost per piece for Intra-BMC is the same amount for all zones for each weight increment, but for DBMC the transportation cost per piece increases in each zone. Fully explain how the transportation costs does not increase from zone to zone.

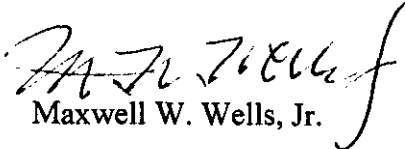
FGFSA/USPS-T-36 - 3. Are Intra-BMC and DBMC parcels combined together at the destination BMC and transported to the postal facilities served by that BMC in the same vehicles? If not, please explain.

FGFSA/USPS-T-36 - 4. If two identical parcels - one rated Intra-BMC and the other rated DBMC - are transported from the same BMC to the same SCF, on the same vehicle, explain how the transportation cost for each parcel can be different.

FGFSA/USPS-T-36 - 5. If a parcel is nonmachinable solely because of weight - in excess of 35 pounds - explain the justification for the additional surcharge in view of the rate element of two cents per pound for "weight related nontransportation handling costs".

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all parties of record in the proceeding in accordance with Section 12 of the Rules of Practice.


Maxwell W. Wells, Jr.

Dated: March 23, 2000