#### **BEFORE THE**

## POSTAL RATE COMMISSION

## WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION OFFICE OF THE SECRETARY

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#### **DOCKET NO. R2000-1**

## **POSTAL RATE AND FEE CHANGES, 2000**

# INTERROGATORIES OF FLORIDA GIFT FRUIT SHIPPERS ASSOCIATION TO USPS WITNESS EGGLESTON (FGFSA/USPS-T-26 - 1-4)

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 Eggleston, USPS-T-26.

Maxwell W. Wells, Jr. Maxwell W. Wells, Jr., P.A. P. O. Box 3628 Orlando, Florida 32802 Telephone (407)422-8250

Attorney for Florida Gift Fruit Shippers Association

Dated: March 23, 2000

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FGFSA/USPS-T-26 - 1. Refer to Attachment P. In the determination of the cost summaries for machinable parcels, how is the cost of the computerized sorting and handling equipment, as well as the cost of the computer programmers, technical support personnel and operators, reflected?

FGFSA/USPS-T-26 - 2. Refer to your Attachment N. Transportation cost for Intra-BMC is the same for each zone. Explain how the transportation costs do not increase from zone to zone.

FGFSA/USPS-T-26 - 3. If two identical parcels - one rate Intra-BMC and the other rated DBMC - are transported from the same BMC to the same SCF, on the same vehicle,

- a. explain how the transportation cost for each parcel can be different.
- b. Since the Intra-BMC parcel also received transportation from the originating SCF to the BMC, explain how the transportation cost for the Intra-BMC parcel can be less than that for the DBMC parcel.

FGFSA/USPS-T-26 - 4. Refer to your Attachment P, pages 10 and 11 for the Intra-BMC model. A comparison of the Wtd Modeled Cost shows that the cost for machinable parcels is 0.0985 and for nonmachinable is 0.0340. Does this show that the cost for a nonmachinable is less than that of a machinable parcel? If not, please explain. I hereby certify that I have this day served the foregoing document upon all parties of record in this proceeding in accordance with Section 12 of the Rules of Practice.

Maxwell W. Wells, Ir.

Dated: March 23, 2000

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