

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

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BRADLEY  
TO INTERROGATORY OF  
THE FLORIDA GIFT FRUIT SHIPPERS ASSOCIATION  
REDIRECTED FROM WITNESS XIE  
(FGFSA/USPS-T1-7)

The United States Postal Service hereby provides the response of witness Bradley to the following interrogatory of the Florida Gift Fruit Shippers Association: FGFSA/USPS-T1-7, filed on March 23, 2000, and redirected from witness Xie.

The interrogatory 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



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April 6, 2000

Response of United States Postal Service Witness Bradley  
to  
Interrogatories of FGFS  
(Redirected from Witness Xie)

FGFS/USPS -T1 -7. Explain the rationale and justification for the expansion of the test data to:

- a. the capacity of the container,
- b. the capacity of the unloaded vehicle.

FGFS/USPS -T1 -7 Response:

a. & b The rationale and justification for "expanding" the test data to include the empty space of the vehicle and the container were provided by the Commission in its Opinion and Recommended Decision in Docket No. R90-1. First, the Commission explained why TRACS "expands" to the capacity of the vehicle:<sup>1</sup>

Another problem that TRACS answers is what to do with respect to the capacity in the vehicles which is not holding mail at any particular time. From time to time, proposals have been made that the costs thought to be associated with this space should be treated as institutional. The problem is particularly difficult because the capacity not holding mail can be expected to change, even on one trip. On the many contracts that involve more than one stop, mail is loaded and unloaded at various facilities. Therefore, at some points the truck may be more full than at others. See Tr. 5/1538.

With TRACS, all unused capacity is accounted for and distributed to the mail on a sampled vehicle. The sampled mail is allocated its "fair share" of empty space by multiplying a ratio

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<sup>1</sup> See PRC Op., R90-1, Vol. 1 at III-161-162

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**of the percent unloaded divided by the percent unloaded plus the percent remaining times that percent empty. The mail that is loaded on the truck further upstream is charged more.**

**Next, the Commission laid out why TRACS "expands" to the container:<sup>2</sup>**

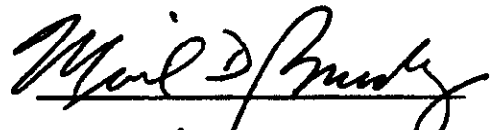
**The analogous question of what to charge the subclass in a container when the container is not completely full is also answered. The entire cost of transporting the selected container is charged to those classes of mail sampled from the container according to the ratio of the classes' cubic-feet to the total cubic-feet of all the subclasses in the container. Tr. 5/1474.**

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<sup>2</sup>**See PRC Op., R90-1, Vol. 1 at III-162**

## DECLARATION

I, Michael D. Bradley, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information and belief.

  
Date: April 6, 2008

**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.

A handwritten signature in cursive script, appearing to read "Susan M. Duchek", is written over a solid horizontal line.

Susan M. Duchek

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