

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

RECEIVED  
JUN 2 4 27 PM '00  
POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

UNITED STATES POSTAL SERVICE  
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO  
THE FLORIDA GIFT FRUIT SHIPPERS ASSOCIATION WITNESS BALL  
(USPS/FGFSA-T1-1-5)  
(June 2, 2000)

Pursuant to rules 25 and 26 of the Rules of Practice and procedure, the United States Postal Service directs the following interrogatories and requests for production of documents to the Florida Gift Fruit Shippers Association witness Ball:

USPS/FGFSA-T1-1-5.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

K N Hollies  
Kenneth N. Hollies

**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.

K N Hollies  
Kenneth N. Hollies

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-3083 Fax -5402

**UNITED STATES POSTAL SERVICE INTERROGATORIES TO THE FLORIDA  
GIFT FRUIT SHIPPERS ASSOCIATION WITNESS BALL**

**USPS/FGFSA-T1-1.** . Please list all documents including testimonies, transcripts, library references, and Commission Opinions and Recommended Decisions from the current and prior proceedings that you reviewed in preparation of your testimony.

**USPS/FGFSA-T1-2.** Refer to page 11, lines 16-18. You state, "This selection of the TRACS samples does not reflect the relative mail volumes, and makes the sampling non-representative and biased." Please demonstrate the alleged bias using rigid mathematical formulae and describe the magnitude and direction of the bias.

**USPS/FGFSA-T1-3.** Refer to your discussion of Standard A, Parcel Post and DBMC mail on page 13, lines 11-22.

(a) Please provide programs, data sets, work papers and associated documentation showing the derivations of all the numbers in lines 14-16 and lines 20-22. Provide specific citations including page number and line number (whenever it's appropriate) for the sources of the data used in the calculation.

(b) Please confirm that the Standard A mail to which you refer includes Enhanced Carrier Route and Nonprofit Standard A mail. If you do not confirm, provide a list of mail categories included in the figures shown for Standard A mail on lines 14 and 20.

**USPS/FGFSA-T1-4.** Refer to page 11, lines 14-16 of your testimony. Please provide programs, data sets, work papers and associated documentation showing the derivation of the utilization of the vehicles - 71.25 percent on out-bound trip and 39.25 percent on the in-bound trip.

**USPS/FGFSA-T1-5.** Refer to page 15, lines 12-13 of your testimony.

(a) Please provide specific citations for the sources of the 13 percent and 24 percent cited.

(b) Is it your understanding that these are the percentages for 'Zero-Volume Tests'?

(c) Is it your understanding that a zero volume test, by definition, reflects a situation in which no mail is unloaded from the vehicle when the test is performed?

UNITED STATES POSTAL SERVICE INTERROGATORIES TO THE FLORIDA  
GIFT FRUIT SHIPPERS ASSOCIATION WITNESS BALL

(d) Consider the following hypothetical example. A truck arrived at a facility where a TRACS test was performed. The data collector observed that the truck was half full but no mail was unloaded from the truck. The truck only picked up mail. Is it your understanding that this test would be recorded as a 'zero volume test'? If not please explain your understanding of what constitutes a zero volume test.