

BEFORE THE
POSTAL RATE COMMISSION

RECEIVED
Jun 14 2 29 PM '00
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000 :

:

DOCKET NO. R2000-1

INTERROGATORY FROM UNITED PARCEL SERVICE
TO FLORIDA GIFT FRUIT SHIPPERS ASSOCIATION
WITNESS JOSEPH E. BALL
(UPS/FGFSA-T1-1)
(June 14, 2000)

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby serves the following interrogatory directed to Florida Gift Fruit Shippers Association witness Joseph E. Ball: UPS/FGFSA-T1-1.

Respectfully submitted,



John E. McKeever
William J. Pinamont
Phillip E. Wilson, Jr.
Attorneys for United Parcel Service

Piper Marbury Rudnick & Wolfe LLP
3400 Two Logan Square
18th & Arch Streets
Philadelphia, PA 19103-2762
(215) 656-3310
(215) 656-3301 (FAX)
and
1200 Nineteenth Street, NW
Washington, DC 20036-2430
(202) 861-3900

Of Counsel.

INTERROGATORY OF UNITED PARCEL SERVICE TO
FLORIDA GIFT FRUIT SHIPPERS ASSOCIATION WITNESS BALL

UPS/FGFSA-T1-1. Refer to page 19 of your testimony, where you state, “[a] 30 lb. parcel receives no greater benefit from the [Postal Service’s delivery] system than does a 5 lb. parcel.”

(a) Explain whether “benefit” may be reasonably measured by the amount or extent of a mailer’s revenue or profit. If “benefit” may not be reasonably measured by the amount or extent of a mailer’s revenue or profit, provide a precise definition of “benefit.”

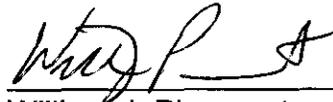
(b) Provide your best estimate of the amount of (i) revenue, and (ii) profit derived from selling a 5 pound gift box of Florida fruit through the Postal Service’s delivery system.

(c) Provide your best estimate of the amount of (i) revenue, and (ii) profit derived from selling a 30 pound gift box of Florida fruit through the Postal Service’s delivery system.

(d) Reconcile your answers to (a)-(c) with the cited statement on page 19 of your testimony.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document by first class mail, postage prepaid, in accordance with Section 12 of the Commission's Rules of Practice.



William J. Pinamont
Attorney for United Parcel Service

Dated: June 14, 2000
Philadelphia, Pa.

63825