

BEFORE THE
POSTAL RATE COMMISSION

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

DOCKET NO. R2000-1

INTERROGATORIES FROM UNITED PARCEL SERVICE
TO FLORIDA GIFT FRUIT SHIPPERS ASSOCIATION
WITNESS JOSEPH E. BALL
(UPS/FGFSA-T1-2 through 7)
(June 19, 2000)

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby serves the following interrogatories directed to Florida Gift Fruit Shippers Association witness Joseph E. Ball: UPS/FGFSA-T1-2 through 7.

Respectfully submitted,



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

UPS/FGFSA-T1-2. On page 11, line 18, of your testimony, you characterize the TRACS sampling process as “non-representative and biased.” Provide a precise definition of the term “biased” as used in this line of your testimony.

UPS/FGFSA-T1-3. On page 12, lines 13-14, of your testimony, you state that “The TRACS samples are randomly selected, and the data produced by each sample should have equal weight in the development of the distribution key.”

(a) Define what you mean by “randomly selected,” and indicate whether, in using that term, you are referring to a “random sample.”

(b) Is a simple random sample “randomly selected,” as you use the term in the quoted passage?

(c) In using data from a simple random sample to make inferences about the population from which the sample is drawn, should each sample be given equal weight?

(d) Is a stratified random sample a “random sample” as you use the term in the quoted passage?

(e) In using data from a stratified random sample to make inferences about the population from which the sample is drawn, should each sample be given equal weight?

UPS/FGFSA-T1-4. In your opinion, does the Postal Service take mail volumes into account in deciding how much highway capacity to purchase?

INTERROGATORY OF UNITED PARCEL SERVICE TO
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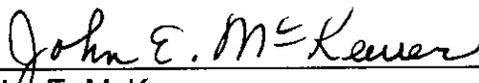
UPS/FGFSA-T1-5. Does the Postal Service pay contractors providing highway transportation on the basis of the volume of mail carried, or on the basis of the amount of capacity provided?

UPS/FGFSA-T1-6. List the principal factors that, in your opinion, prevent the Postal Service from achieving full (i.e., 100 percent) utilization of the highway transportation capacity that it uses.

UPS/FGFSA-T1-7. How, in your opinion, should the costs of unused highway transportation capacity be covered?

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.



John E. McKeever
Attorney for United Parcel Service

Dated: June 19, 2000
Philadelphia, Pa.

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