

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

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**DOCKET NO. R2000-1**

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**POSTAL RATE AND FEE CHANGES, 2000**

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ANSWERS OF FLORIDA GIFT FRUIT SHIPPERS ASSOCIATION  
TO INTERROGATORIES OF UNITED STATES POSTAL SERVICE  
WITNESS BALL (USPS/FGFSA-T1-1-5)

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Dated: June 19, 2000

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.

ANSWER: PRC OP Docket No. R97-1, Testimony and responses to FGFSA interrogatories by USPS witnesses, Xie, USPS-T-1, Bradley, USPS-T-18, Plunkett, USPS-T-36, and Eggleston, USPS-T-26, analysis of data contained in LR-I-52

USPS/FGFSA-T1-2. Refer to page ii, 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.

Answer: I did not use a rigid mathematical formula. The cited response of Witness Xie demonstrates the bias of the sampling Intra-BMC 51% on the inbound trip and 49% on the outbound trip. The relative estimated mail volumes are shown on page 13 of my testimony.

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.

Answer:

(a) Lines 14-16 are the quarterly averages of the distribution keys shown in LR-I-52. The numbers shown in lines 20-22 are calculated using the data referenced in the footnote.

(b) Confirmed.

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 outbound trip and 39.25 percent on the in-bound trip.

Answer: Response of USPS to interrogatory TR 6760.

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?

(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.

Answer:

(a) TR 6768

(b) Yes

(c) No.

(d) No. I understand that a "zero volume test" is one where there was no mail on the vehicle at the time of the TRACS test.

# DECLARATION

I, Joseph E. Ball, declare under penalty of perjury that the answers to interrogatories USPS/FGFSA-T-1-1 through 5 are true and correct, to the best of my knowledge, information and belief.

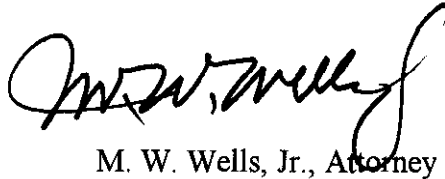
Dated June 19, 2000.

  
Joseph E. Ball

# CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

Dated June 19, 2000.

  
M. W. Wells, Jr., Attorney