

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

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POSTAL RATE AND FEE CHANGES, 2000

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY
Docket No. R2000-1

UNITED STATES POSTAL SERVICE FOLLOW-UP
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO
THE FLORIDA GIFT FRUIT SHIPPERS ASSOCIATION WITNESS BALL
(USPS/FGFSA-T1-6-7)

Pursuant to rules 25 and 26 of the Rules of Practice and Procedure, the United States Postal Service directs the following follow-up interrogatories and requests for production of documents to the Florida Gift Fruit Shippers Association witness Ball:
USPS/FGFSA-T1-6-7.

These questions are submitted under an informal agreement that written responses should obviate the need for oral cross-examination of Mr. Ball by the Postal Service.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

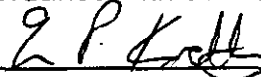
By its attorney:



Eric P. Koetting

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.



Eric P. Koetting

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July 14, 2000

USPS/FGFSA-T1-6. Please refer to your response to USPS/FGFSA-T1-5, parts c) and d), where you state that you understand that a "zero-volume test" is one where there was no mail on the vehicle at the time of the TRACS test.

a. Please refer to the oral cross-examination by your counsel of Dr. Xie, the Postal Service's expert on the TRACS system, at Tr. 17/6925-26. Please confirm that at lines 20-25 on page 6925, and lines 1-2 on page 6926, she explains that a zero-volume test refers to a test when no mail is unloaded, and expressly rejected the alternative suggestion that a "zero-volume test" indicated that there was no mail on the truck. If you cannot confirm, please explain fully.

b. Please confirm that the statements on lines 12-14 of page 15 of your testimony are based on an apparent misunderstanding of what constitutes a "zero-volume test." If you cannot confirm, please explain fully.

USPS/FGFSA-T1-7. Please refer to your response to USPS/FGFSA-T1-3, which related to the two tables appearing on page 13 of your testimony.

a. Please confirm that in the top table, the TRACS distributions, the factors shown correspond to cubic foot miles. If you cannot confirm, please explain fully.

b. Please confirm that in the bottom table, the factors shown correspond to cubic feet. If you cannot confirm, please explain fully.

c. Please confirm that in the top table, the TRACS distributions, the column headings (Intra-BMC and Inter-BMC) are intended to reflect data groupings based on categories of transportation. If you cannot confirm, please explain fully.

d. Please confirm that in the bottom table, the column headings (Intra-BMC and Inter-BMC) are intended to reflect data groupings based on rate categories. If you cannot confirm, please explain fully.

e. Please confirm that each of the two Standard A numbers in the second table (line 20) is the product obtained when a number of pounds is multiplied by a density factor. If you cannot confirm, please explain fully.

f. For each of the two Standard A numbers in the second table, please reproduce the number of pounds utilized and the density factor utilized in making the calculation.

g. For each of the two Standard A numbers, please identify the page within Attachment B to USPS-T-27 where the pound figure utilized in your calculation appears. If the pound figure utilized in your calculation is the sum of a number of pound figures which appear in Attachment B, please identify each of the components of the sum, and the page of Attachment B where each component appears.