

BEFORE THE
POSTAL RATE COMMISSION

Washington, D.C. 20268

DOCKET NO. R2000-1

ANSWERS OF FLORIDA GIFT FRUIT SHIPPERS ASSOCIATION
TO FOLLOW-UP INTERROGATORIES OF UNITED STATES
POSTAL SERVICE
WITNESS BALL USPS/FGFSA-T1-6-7

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Dated July 17, 2000

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

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 in unloaded, and expressly rejected the alternative suggestion that a “zero-volume test” indicated that there was no mail on the truck. If you cannot fully 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.

Answer:

- a. Confirmed. USPS witness Xie also testified (TR 6927) that the details could be located in the Z file, which is part of USPS-LR-I-52.
- b. Not confirmed. As witness Xie suggested, USPS-LR-I-52 was reviewed and the 1424 “0” unloads for Inter-BMC and Intra-BMC were examined. For Inter-BMC tests, there were 222 recorded, of which 110, or 49.5%, also show that the vehicle also was 100% empty. The test for 87 of the 110 occurred at the BMC, which, for Inter-BMC transportation, is the final destination. This data supports my conclusion that the transportation service is not dependent on mail volume, and the variabilities shown by Dr. Bradley are not accurate. For the Intra-BMC tests, there were 417 recorded, of which 269, or 64.5%, also show that the vehicle also was 100% empty. Only 17.8% of the 100% empty tests occurred on the outbound trip. This demonstrates that the utilization of the transportation on the inbound trip is much less than on the outbound trip. This data also supports the conclusion stated in my testimony.

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 Standard A numbers in the second table (line20) in 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.

ANSWER:

- a. Confirm that the factors shown correspond to calculated cubic foot miles of the “expanded” cubic feet of the sampled mail.
- b. Confirmed.
- c. Confirm that the TRACS distributions reflect data groupings by mail categories based on categories of transportation.
- d. Confirm that the bottom table reflect data groupings by mail categories, including various rate categories included within a mail category, based on categories of transportation.
- e. Confirm, subject to the explanation that the density factor is stated as lb/cuft, so that it must be inverted for the multiplication.
- f. Refer to Attachment B, Table 1 to USPS-T27.

The numbers used came from:

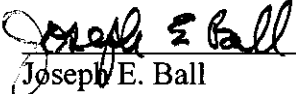
Inter-BMC:	Flow Number 10	2,180,622 thousand pounds
Intra-BMC	Flow Number 11	5,151,790 thousand pounds
	Flow Number 12	167,010 thousand pounds
	Total	5,318,800

The number used for Intra-BMC apparently were understated and should have included Flow Numbers 4 – 7, which would have added 1,030,707 thousand pounds.

The density factor used was derived from USPS-LR-I-52, Appendix III, Table 1; Mail Codes and Density Factor. The density factor used in the calculation was 17.44, which is the average of the density factors for regular Standard A – 17.84 and for non-profit Standard A – 17.05. Perhaps a weighted average would have been preferable, but I did not have the information to develop a weighted average.

DECLARATION

I, JOSEPH E. BALL, declare, under the penalties of perjury, that the matters and facts set forth in the foregoing are true and correct, to the best of my knowledge, information and belief.



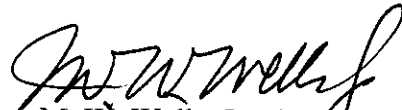
Joseph E. Ball

Dated: July 15, 2000

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing has been mailed this date to all parties of record in accordance with the Rules of Practice.

Dated this 17 day of July, 2000.


M. W. Wells, Jr., Attorney