

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

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POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-14

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

UNITED STATES POSTAL SERVICE FOLLOW-UP
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO
THE FLORIDA GIFT FRUIT SHIPPERS ASSOCIATION WITNESS BALL
(USPS/FGFSA-T1-8)

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-T1-8.

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, and pursuant to rights reserved by the Postal Service at Tr. 30/14339.

Respectfully submitted,

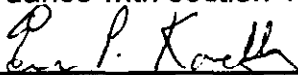
UNITED STATES POSTAL SERVICE

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 24, 2000

USPS/FGFSA-T1-8. Please refer to your responses to USPS/FGFSA-T1-5 and USPS/FGFSA-T1-6.

a. Please confirm that your testimony on lines 12-14 on page 15 claims that 13 percent of the TRACS samples in Inter-BMC transportation and 24 percent of the TRACS samples in Intra-BMC transportation "reflect that there was no mail on the vehicle at the time of the TRACS sample." If you cannot confirm, please explain fully.

b. Please confirm that your response to USPS/FGFSA-T1-5(b) indicated that the cited percentages (i.e., 13 percent and 24 percent) related to "Zero-Volume Tests," and that your response to USPS/FGFSA-T1-5(d) stated your understanding that a "Zero-Volume Test" is one where there was no mail on the vehicle at the time of the TRACS test. If you cannot confirm, please explain fully.

c. Please confirm, as indicated in your response to USPS/FGFSA-T1-6(a) and in the oral cross-examination by your counsel of Dr. Xie, the Postal Service's expert on the TRACS system, at Tr. 17/6925-26, that your original understanding that a "Zero-Volume Test" is one where there was no mail on the vehicle at the time of the TRACS test is incorrect, and that a "Zero-Volume Test" will be recorded if no mail was unloaded, even if, in fact, there was mail on the vehicle at the time of the test. If you cannot confirm, please explain fully.

d. Please refer to your response to USPS/FGFSA-T1-6(b) and confirm that:

- (i) With respect to the percentage of 49.5 shown for Inter-BMC, this does not reflect the percentage of **total** vehicles which were empty at the time of the sample, but instead only reflects the percentage of the subset of vehicles for which a "Zero-Volume Test" was recorded.
- (ii) For the 13 percent Inter-BMC figure on page 15 of your testimony to be correct, the 49.5 percent figure cited above would have to have been 100 percent.
- (iii) With respect to the percentage of 64.5 shown for Intra-BMC, this does not reflect the percentage of **total** vehicles which were empty at the time of the sample, but instead only reflects the percentage of the subset of vehicles for which a "Zero-Volume Test" was recorded.
- (iv) For the 24 percent Intra-BMC figure on page 15 of your testimony to be correct, the 64.5 percent figure cited above would have to have been 100 percent.

If you are unable to confirm any of the above, please explain fully.

e. Please confirm that the 13 and 24 percent figures cited on lines 12-14 on page 15 of your testimony were based on a misunderstanding of what constitutes a "Zero-Volume Test," and do not correctly identify the percentage of TRACS samples within those categories for which there was no mail on the vehicle at the time of the test. If you cannot confirm, please explain fully.