

BEFORE THE
POSTAL RATE COMMISSION

Washington, D.C. 20268

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POSTAL RATE COMMISSION
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DOCKET NO. R2000-1

ANSWERS OF FLORIDA GIFT FRUIT SHIPPERS ASSOCIATION
TO FOLLOW-UP INTERROGATORIES OF UNITED STATES POSTAL SERVICE
WITNESS BALL USPS/FGFSA-T1-8

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Attorney for Florida Gift Fruit
Shippers Association

Dated July 27, 2000

USPS/FGFSA-T1-8. Please refer to your responses to USPS/FGFSA-T1-5 and 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-T11-6(a) and in the oral cross-examination by your counsel of Dr. Xie, the Postal Service's exert 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 per 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 was 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.

RESPONSE:

- a) Confirmed.
- b) Confirmed.
- c) Confirmed.
- d)
 - i) Confirm that 49.5% of the 222 Zero-Volume Test samples for Inter-BMC also show that the vehicle was 100% empty.
 - (ii) The 13% Inter-BMC figure on page 15 of my testimony is the percentage shown by USPS witness Xie in response to MPA/USPS-T1-5. TR 17/6768. The correct figure for my testimony is that 49.5% of the 13% are samplings where there was no mail on the vehicle at the time of the test.
 - (iii) Confirm that 64.5% of the 417 Zero-Volume Test samples for Intra-BMC also show that the vehicle was 100% empty.
 - (iv) The 24 percent Intra-BMC figure on page 15 of my testimony is the percentage shown by USPS witness Xie in response to MPA/USPS-T1-5. TR 17/6768. The correct figure for my testimony is that 64.5% of the 24% are samplings where there was no mail on the vehicle at the time of the test.
- (e) The 13 and 24 percent figures were based on the above cited response by witness Xie. I misunderstood that a "Zero-Volume Test" was one where there was no mail on the vehicle at the time of the sample. As witness Xie suggested, USPS-LR-I-52 was reviewed. The "0" unload column was examined and reflects that of the 13% Inter-BMC figure, only 49.5% of the 13% were samples taken where there was no mail on the vehicle at the time of the test, and that of the 24% Intra-BMC figure, only 64.5% of the 24% were samples taken where there was no mail on the vehicle at the time of the test. 13% Inter-BMC figure, only 49.5% of the 13% were samples taken where there was no mail on the vehicle at the time of the test, and that of the 24% Intra-BMC figure, only 64.5% of the 24% were samples taken where there was no mail on the vehicle at the time of the test.

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.

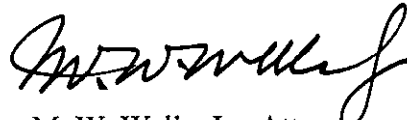

Joseph E. Ball

Dated: July 27, 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 27th day of July, 2000.



M. W. Wells, Jr., Attorney