

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

DOCKET NO. R97-1

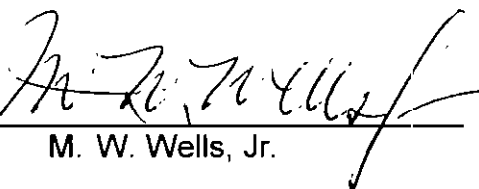
FLORIDA GIFT FRUIT SHIPPERS ASSOCIATION
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS HATFIELD, USPS-T-16

FGFSA/USPS-T16-16-18

SEPTEMBER 3, 1997

Florida Gift Fruit Shippers Association (FGFSA) hereby submits the attached interrogatories to USPS Witness Hatfield (USPS-T-16) and requests a timely and full response under oath.

Florida Gift Fruit Shippers Association

By 
M. W. Wells, Jr.

Maxwell W. Wells, Jr., P.A.
105 E. Robinson Street, Suite 201
P. O. Box 3628
Orlando, FL 32802

FGFSA/USPS-T16-16

Assume that there are two identical (size, shape, weight and cube) parcels, one using the Intra-BMC rate and the other using the DBMC rate, with both parcels destined for the same address, that are transported on the same day in the same vehicle from the same BMC to the same destination SCF.

- a) Confirm that the transportation cost from the BMC to the SCF for the Intra-BMC parcel be determined on the basis of the cubic feet of the parcel. If you do not confirm, please explain.
- b) Confirm that the transportation cost from the BMC to the SCF for the DBMC parcel be determined on the basis of the cubic foot miles of the parcel. If you do not confirm, please explain.
- c) Explain why the transportation costs of these two identical parcels, for this portion of the transportation service should each be determined in a different manner.

FGFSA/USPS-T16-17

Refer to your response to FGFSA/USPS-T-16-10 and your statement that "However, there do exist instances in which parcel post travels directly from an origin SCF to a destination SCF."

- a) Identify all of the factors taken into account in determining when those "instances" apply for machinable parcels entered using the Intra-BMC.
- b) Confirm that the usual and customary operating procedures for handling parcel post provide that the parcels will be sent to the BMC for sorting.
- c) Are the parcels sent to the BMC for sorting for the convenience of the Postal Service or the mailer?
- d) Confirm that one reason for sending the parcels to the BMC for sorting is to avoid manual sorting at the SCF.
- e) If more than 30 parcels, destined for various 5-digit delivery offices, are entered by the same mailer at the same time, will these parcels be sorted manually by the SCF or will they be sent to the BMC for sorting?

FGFSA/USPS-T-16-18

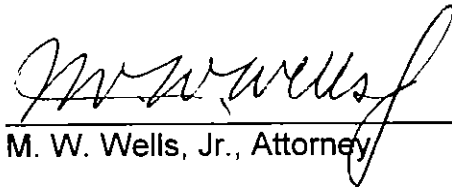
Refer to your response to FGFSA/USPS-T-16-8. Since you did not confirm the travel pattern described, please explain what other travel pattern would be used by the Postal Service for this parcel originating in Panama City, Florida and destinating in Tampa, Florida.

a) Confirm that the selection of the travel pattern is for the convenience of the Postal Service. If you do not confirm, please fully explain.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all parties of record in this proceeding on this date in accordance with Section 12 of the Rules of Practice and Procedure.

Dated : September 3, 1997



M. W. Wells, Jr., Attorney

M. W. Wells, Jr., Attorney