

DOCKET SECTION

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

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS MOELLER TO INTERROGATORIES OF
THE FLORIDA GIFT FRUIT SHIPPERS ASSOCIATION
(FGFSA/USPS-T36-1-3)

The United States Postal Service hereby provides responses of witness Moeller to the following interrogatories of the Florida Gift Fruit Shippers Association: FGFSA/USPS-T36-1-3, filed on September 16, 1997.

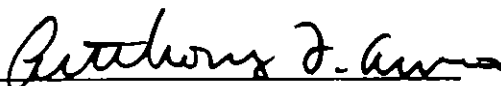
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


Anthony F. Alverno

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2997; Fax -5402
September 30, 1997

U.S. POSTAL SERVICE WITNESS MOELLER RESPONSE TO
INTERROGATORIES OF FLORIDA GIFT FRUIT SHIPPERS ASSOCIATION

FGFSA/USPS-T36-1. To what extent do you expect the destination entry rate proposals to result in a diversion of Standard A mail for other entry points. Please quantify.

RESPONSE:

The after-rates distribution of pieces by destination-entry option for each rate category is based on the billing determinants for FY97 quarters 1 and 2 for commercial Standard Mail (A) and FY97 quarter 2 for nonprofit Standard Mail (A). There is no estimation of "diversion" of Standard Mail (A) for other entry points. Please also see responses to MASA/USPS-T36-4, MASA/USPS-T36-6, and MASA/USPS-T36-7.

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FGFSA/USPS-T36-2. Please provide the entry profile for Standard A mail, with volumes for each entry point.

RESPONSE:

Please see USPS LR-H-111, Appendix A, Table 1 for the entry profile which is generated from volume data in USPS LR-H-105.

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FGFSA/USPS-T36-3. Please confirm the the [sic] flowpath of Standard A mail in the postal transportation system shown in Appendix A to USPS Library Reference H-111 correctly reflects the use of the transportation system by Standard A mail for the base year. If you do not confirm, please provide a correct flowpath.

RESPONSE:

I have no reason to believe that the library reference does not provide a reasonable representation of the flowpath.

DECLARATION

I, Joseph D. Moeller, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

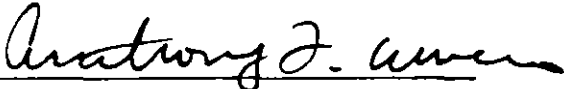


JOSEPH D. MOELLER

Dated: September 30, 1997

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.


Anthony F. Alverno

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