

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-T

UNITED STATES POSTAL SERVICE
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO
THE FLORIDA GIFT FRUIT SHIPPERS ASSOCIATION WITNESS MEREWITZ
(USPS/FGFSA-T-1-17-33)

Pursuant to rules 25 and 26 of the Rules of Practice and Procedure and rule 2 of the Special Rules of Practice, the United States Postal Service directs the following interrogatories and requests for production of documents to the Florida Gift Fruit Shippers Association witness Merewitz: USPS/FGFSA-T-1-17-33.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
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January 9, 1998

USPS/FGFSA-T1-17. On page 10, lines 1-3 of your testimony, you cite two average capacity utilization figures: 56.7% for intra BMC and 69% for inter BMC. You state that these figures are "shown in LAM-9b". Please confirm that these figures are not shown in Exhibit LAM-9b. Please explain their derivation or correct them.

USPS/FGFSA-T1-18. Please indicate the source of the 49% spending increase cited on page 10, line 3.

USPS/FGFSA-T1-19. Please refer to page 10, lines 5-7 of your testimony.

(a) Please explain what you mean by "real purchased transportation" on page 10, lines 6-7.

(b) Please explain the derivation of the 97% figure on line 6.

USPS/FGFSA-T1-20. Please refer to page 12, line 2 of your testimony. Please explain why you believe that TRACS is "not a statistical system."

USPS/FGFSA-T1-21. Please refer to page 12, lines 3-4 of your testimony. What forms are you referring to that are to be filled out by PW?

USPS/FGFSA-T1-22. Please refer to page 21, line 5 of your testimony, where you state that it is "efficient to have a high load factor."

- (a) Please define the term "load factor."
- (b) Please define the term "efficient" as you use it here.

USPS/FGFSA-T1-23. Please define the terms "line haul" and "back haul" as you use them on page 21, line 14 of your testimony.

USPS/FGFSA-T1-24. Is it your understanding that the Postal Service is required to pay for the backhaul on any one-way trip? Please explain.

USPS/FGFSA-T1-25. Consider the following routing: BMC to SCF1 to SCF2 to AO to SCF2 to BMC. Which of these legs is the "line haul" and which is the "backhaul". Please explain.

USPS/FGFSA-T1-26. Consider the following routing: BMC1 to BMC2 to BMC1. Which of these legs is the "line haul" and which is the "backhaul". Please explain.

USPS/FGFSA-T1-27. Consider the following routing BMC to SCF to AO. Which of these legs is the "line haul" and which is the "backhaul". Please explain.

USPS/FGFSA-T1-28. Please consider the following hypothetical. A truck shuttles back and forth between two facilities three times. From A to B on the outbound leg, the truck is always 50 percent full. From B to A the truck is empty on the first two trips but full on the third trip.

(a) Please confirm that the average capacity utilization is 50 % $((0.5 + 0.5 + 0.5)/3)$ on the outbound (A to B) movement.

(b) Please confirm that the average capacity utilization is 33 percent $((0 + 0 + 1.00)/3)$ on the inbound movement (B to A).

(c) Is it your understanding that the size of the truck was caused by the mail on the outbound movement? Please explain.

(d) In your opinion, should the entire cost of the route in this example be distributed to the mail causing the peak? Please explain.

(e) In your opinion, does the inbound peak volume cause 100 percent of the capacity cost to be incurred or 50 percent, the incremental capacity above and beyond what is needed to meet the outbound volume?

USPS/FGFSA-T1-29. Please refer to the discussion of preferential and nonpreferential transportation beginning on the bottom of page 25 of your testimony.

(a) Please confirm that your understanding of the increase in preferential mail on nonpreferential transportation is based on TRACS data. Please explain any nonconfirmation.

(b) Are you asserting that preferential mail or red tag service standards have resulted in better service for Periodicals distributed at BMCs? Why has this service improved?

(c) Would you agree that, as one way to provide better service to Periodicals sorted at BMCs, the frequency of some intra- and inter-BMC trips mail could be increased? Please explain any disagreement

(d) To the extent that Standard A and B mail gets more frequent transportation on the same trucks as "red tag" or other preferential mail, would you expect its service to be enhanced. Please explain.

USPS/FGFSA-T1-30. Please refer to page 27, lines 7-20 of your testimony.

(a) Is it your understanding that the sample selection process in TRACS should seek to minimize variance in the absence of other considerations? Please explain.

(b) Please provide a formal, mathematical definition of the phrase "bias in data collection."

(c) What is the relationship between minimum variance and bias?

USPS/FGFSA-T1-31. Please refer to your carpool example on pages 14-15.

Assume the car in question has seating for 4 occupants (three passengers and the driver). Please state whether you agree or disagree with each of the following statements and explain your answers.

(a) When the 4 seats are taken, additional adult passengers can be added to the laps of the occupants.

(b) Assume one of the occupants is a child. An adult can be seated on the child.

(c) Assume all four seats are full with adults. It is appropriate to place babies on the laps or shoulders of the occupants.

(d) Assuming three of the four seats are occupied, it is appropriate to fill the fourth seat with boxes of toys, books or other freight.

USPS/FGFSA-T1-32. How many TRACS highway tests have you personally observed? Please state the date and location of each such test.

USPS/FGFSA-T1-33. Have you ever worked for United Parcel Service as a consultant or in any other capacity? If so, please provide the dates of such employment and describe the nature of such work in detail.

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.



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