

DOCKET SECTION

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

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POSTAL RATE AND FEE CHANGES, 1997

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY
Docket No. R97-1

UNITED STATES POSTAL SERVICE
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO
THE FLORIDA GIFT FRUIT SHIPPERS ASSOCIATION WITNESS DAVIS
(USPS/FGFSA-T3-1-5)

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 Davis: USPS/FGFSA-T3-1-5.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


Susan M. Duchek

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2990; Fax -5402
January 12, 1998

USPS/FGFSA-T3-1. On page 2 of your testimony you state that you use "line-haul tractor trailer transportation, utilizing refrigerated trucks loaded to a capacity of 45,000 pounds. Parcels are drop-shipped at destination postal facilities."

- (a) Please describe how Pittman and Davis purchases this transportation. Does it own the vehicles itself, does it lease them, obtain them under contract with a contract carrier, or does it use a common carrier.
- (b) How many postal facilities do you dropship to?
- (c) How many tractor trailers do you dispatch?
- (d) To what extent do your tractor trailer shipments split their load among several destination postal facilities? Please explain.
- (e) How do you decide which facilities receive your drop shipments? Please explain what factors influence your decision, including volume, value of shipments, cube, ability to consolidate shipments with other mailers, service performance, service commitments, etc.
- (f) What is the average number of pieces drop shipped to each facility?
- (g) What is the average weight of pieces drop shipped to each facility?
- (h) What is the average cube of pieces drop shipped to each facility?

USPS/FGFSA-T3-2. What percentage of the Pittman and Davis business now shipped using the Postal Service is mailed to residential addresses?

USPS/FGFSA-T3-3. Will Pittman and Davis qualify for any of the new discounts the Postal Service is proposing for Standard B mail (see USPS-T-37)?

- (a) If so, please specify each such discount and provide an estimate of the volumes qualifying for each.

- (b) If not, does Pittman and Davis have plans to consolidate its shipments with those of other mailers in order to qualify?

USPS/FGFSA-T3-4. How does Pittman and Davis determine the price to charge for a 10 pound package of fruit versus a 30 pound package of fruit? In providing your response, please assume that the type and quality of fruit in each package is the same.

USPS/FGFSA-T3-5. Please refer to page 4, lines 16-18 of your testimony. How does Pittman and Davis determine that a customer does not repeat due to a price increase, rather than for some other reason (spoiled fruit, late delivery, etc.)?

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.



Susan M. Duchek

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Washington, D.C. 20260-1137
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