

DOCKET SECTION

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

RECEIVED

JAN 13 4 31 PM '98

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 BALL
(USPS/FGFSA-T2-1-8)

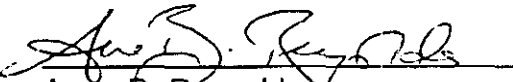
Pursuant to rules 25 and 26 of the Rules of Practice and Procedure and rule 2 of the Special Rules of Practice, the United States Postal Service directs the following interrogatories and requests for production of documents to the Florida Gift Fruit Shippers Association witness Ball: USPS/FGFSA-T2-1-8.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


Anne B. Reynolds

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2970; Fax -5402
January 13, 1998

USPS/FGFSA-T2-1. Please refer to your discussion of the transportation or truck program sponsored by the FGFSA.

(a) On page 6 line 20, you describe the pickup service that is provided as part of the truck program. When your pickups are run, do your trucks operate full on each leg of their journey? If your answer is anything but an unqualified yes, please explain.

(b) On page 7 line 1, you state that trucks are routed “as required.” Please describe what you mean by “as required.” Are minimum volumes required to participate in the program? Who determines when volume is sufficient to constitute a pick up?

(c) Are any materials shipped from the terminal to customers, or do the shipments only move from the customers to the terminal?

(d) Are the rates described on page 8, lines 21-22, charged by the Association to the participants in the program, or are these rates charged to the Association by a third party trucking firm?

(e) Please confirm that the typical truck may serve as many as seven destinations (the final destination and “as many as six” (page 8, line 23) partial unloadings along the way). If you do not confirm, please explain.

(f) Please confirm the average number of destinations is usually less than four (“less than three” (page 8, line 23) partial unloadings plus the final destination). If you do not confirm please explain.

(g) On the routes described in your testimony, is the final destination ever the Association's truck terminal in Orlando?

USPS/FGFSA-T2-2. Please refer to your discussion of Standard A and parcel post volumes on page 11 of your testimony.

(a) Please describe and provide the derivation of the average "distribution key" for Standard A mail of 26.652%. Please confirm whether this figure includes Nonprofit Standard A mail. Please confirm whether this figure includes ECR Standard A mail.

(b) Please describe and provide the derivation of the average "distribution key" for Intra-BMC parcel post of 21.618%.

(c) Please describe and provide the derivation of the average "distribution key" for DBMC parcel post of 7.597%.

(d) Is it your understanding that the distribution factors listed in parts a through c are based on cubic feet or on cubic foot-miles?

(e) Have you studied the extent to which ECR Standard A mail is entered beyond the BMC? If so what are the results of your research?

USPS/FGFSA-T2-3. On pages 11-12 of your testimony, you state that "inconsistencies appear to exist in the development of distribution keys for other subclasses of fourth-class mail, but the mail flow to establish the true quantity of such sub-classes (sic) use of intra-BMC transportation cannot be determined from the data available to me."

(a) Please specify the data that you considered in making this conclusion.

(b) Please explain, how, in the absence of data that you consider to be appropriate, you can draw conclusions about mail flows.

(c) Is it your testimony that the Commission should make decisions on cost distributions based on speculation regarding the magnitude of mail flows?

USPS/FGFSA-T2-4. Please refer to page 12, lines 4-5 of your testimony.

(a) By “highway transportation costs”, are you referring to all highway transportation, not just intra-BMC?

(b) If the answer to (a) is yes, please provide a source for the assertion that intra-BMC, inter-BMC and inter-SCF transportation distribution are based on cubic feet.

USPS/FGFSA-T2-5. Please explain what you mean by the statement: “This sampling is heavily biased . . .” at page 12, line 14 of your testimony.

USPS/FGFSA-T2-6. In your opinion does a “biased sample” lead to biased estimates? Please explain.

USPS/FGFSA-T2-7. On page 12, lines 17-18 of your testimony, you state:

“Thus, 70% of the TRACS sampling will not record any significant part of the third class volume.” Please describe and provide the derivation of this 70% figure.

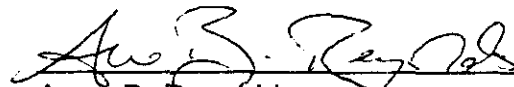
USPS/FGFSA-T2-8. On page 13, lines 7-8 of your testimony, you state that the “USPS has and uses capacity in excess of that needed for moving mail.”

(a) Please describe what you regard as the amount of capacity “needed for moving the mail.”

(b) Is this statement based on your understanding of the amount of empty space measured in TRACS tests? If not, please explain the basis for your statement.

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.


Anne B. Reynolds

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
January 13, 1998