

DOCKET SECTION

BEFORE THE  
POSTAL RATE COMMISSION

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

DOCKET NO. R97-1

**INTERROGATORIES OF UNITED PARCEL SERVICE TO  
FLORIDA GIFT FRUIT SHIPPERS ASSOCIATION WITNESS BALL  
(UPS/FGFSA-T2-1 through 2)**

(January 15, 1998)

Pursuant to the Commission's Special Rules of Practice, United Parcel Service hereby serves the following interrogatories and request for production of documents directed to Florida Gift Fruit Shippers Association witness Ball (UPS/FGFSA-T2-1 through 2).

Respectfully submitted,



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**INTERROGATORIES OF UNITED PARCEL SERVICE TO  
FLORIDA GIFT FRUIT SHIPPERS ASSOCIATION WITNESS BALL**

**UPS/FGFSA-T2-1.** Refer to page 13 of FGFSA-T-2. Provide all supporting documentation and analyses for your assertion that the Postal Service has selected and contracted for vehicle capacity far in excess of that needed to transport mail.

**UPS/FGFSA-T2-2.** Refer to page 7 of FGFSA-T-2 regarding calculation of the appropriate rate for a parcel based on zip code. Is the Association able, at its choice, to designate any post office within the BMC area as the entry post office for purposes of determining the origin zip code even though the parcel is dropped at the BMC, or does the Postal Service require that the BMC (or some other facility designated by the Postal Service) be treated as the entry office for purposes of determining the origin zip code for rate purposes? Please explain your answer.

**CERTIFICATE OF SERVICE**

I hereby certify that I have this date served the foregoing document in accordance with section 12 of the Commission's Rules of Practice.

  
Stephanie Richman

Dated: January 15, 1998  
Philadelphia, PA