

DOCKET SECTION

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

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POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

UNITED STATES POSTAL SERVICE
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO
THE FLORIDA GIFT FRUIT SHIPPERS ASSOCIATION WITNESS MEREWITZ
(USPS/FGFSA-T1-34-38)

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-T1-34-38.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


Anne B. Reynolds

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January 15, 1998

USPS/FGFSA-T1-34. Please refer to Exhibit LAM-4b in your testimony. Please provide explicit citations for the Standard Mail (A) figures presented in this exhibit.

USPS/FGFSA-T1-35. Please confirm that a route with a 2400 cubic feet capacity vehicle which makes five trips a day at 100 miles each yields the same cubic foot miles as a route with a 1600 cubic feet capacity vehicle making five trips a day at 150 miles each.

USPS/FGFSA-T1-36. Please refer to page 28 of your testimony. Please provide a basis for the statement, "AOs and DUs have less dock activity per hour."

USPS/FGFSA-T1-37. Please consider the following route trip:

BMC1 to SCF1 to SCF2 to BMC1

a. Would you consider the first leg of the route trip (BMC1 to SCF1) inbound or outbound?

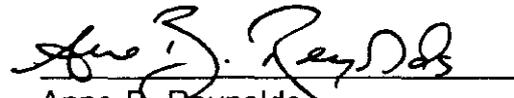
b. Would you consider the second leg of the route trip (SCF1 to SCF2) inbound or out bound?

c. Would you consider the third leg of the route trip (SCF2 to BMC1) inbound or outbound?

FGFSA/USPS-T1-38. On page 9, lines 19-20 of your testimony, you state
“Several of the major changes of dropshipping should have had their impact by
now.” Please provide your estimate of the costs of postal transportation in the
absence of destination entry discounts.

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

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