

**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, 2000

Docket No. R2000-1

**INTERROGATORIES OF
RECORDING INDUSTRY ASSOCIATION OF AMERICA
TO USPS WITNESS MOELLER
(RIAA/USPS-T-35-1-2)**

Pursuant to Sections 25 and 26 of the rules of practice, the Association for Postal Commerce submits the attached interrogatories to USPS witness Moeller RIAA/USPS-T-35-1-2. If the designated witness is unable to respond to any interrogatory, we request a response by some other qualified witness.

Respectfully submitted,



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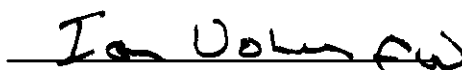
RIAA/USPS-T-35-1. The residual shape surcharge that you advocate applies to "Standard Mail (A) Regular that is neither letter-nor flat-shaped, or is prepared as a parcel." USPS-T-35 at 6 lines 16-17. Please enumerate each characteristic of an otherwise flat-size mail piece (as defined by DMM Section C050) that would render the piece subject to the residual shape surcharge by reason of the piece being "prepared as a parcel."

RIAA/USPS-T-35-2. For each of the characteristics that you have listed in response to interrogatory 1 above, please explain how the characteristic results in increased costs to the Postal Service that warrant imposition of the residual shape surcharge.

DC1:110920

CERTIFICATION

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding having requested service of discovery documents in accordance with Section 12 of the rules of practice.



Ian D. Volner