

**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 CRUM  
(RIAA/USPS-T-27-2)**

Pursuant to Sections 25 and 26 of the rules of practice, Recording Industry Association of America ("RIAA") submits the attached interrogatory to USPS witness Crum: RIAA/USPS-T-27-2. 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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Counsel for Recording Industry Association  
of America

RIAA/USPS-T-27-2. In your answer to OCA/USPS-T-27-9 you referred to “the uncertainties related to the issue described on page 7, lines 18-22 of my testimony . . . .”

- (a) What are the “uncertainties” to which your response refers?
- (b) Please confirm that for all of 1998 mail pieces meeting the dimension and preparation requirements for flats in all particulars but thickness and having a thickness between .75 inches and 1.25 inches were categorized as parcels.
- (c) Please confirm that mail pieces described in subpart (b) above were at and after October 4, of 1999 categorized as flats.
- (d) Please provide the mail processing costs for the mail pieces described in subpart (b) above for (i) FY 1998 and (ii) FY 1999.
- (c) What do you project the mail processing costs for the mail pieces described in subpart (b) above to be in the FY 2001?

## 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.

  
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Ian D. Volner