

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

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POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

**INTERROGATORIES OF
RECORDING INDUSTRY ASSOCIATION OF AMERICA
TO USPS WITNESS CAMPBELL
(RIAA/USPS-T-29-1-4)**

Pursuant to Sections 25 and 26 of the rules of practice, the Association for Postal Commerce submits the attached interrogatories to USPS witness Campbell: RIAA/USPS-T-29-1-4. If the designated witness is unable to respond to any interrogatory, we request a response by some other qualified witness.

Respectfully submitted,



Ian D. Volner
N. Frank Wiggins
Venable, Baetjer, Howard & Civiletti, LLP
1201 New York Avenue, N.W.
Suite 1000
Washington, DC 20005-3917

Counsel for Association for Postal Commerce

RIAA/USPS-T-29-1. Note 1 to LR-I-110 Table 5.2.2.2 discloses that ACS and non-ACS key stroke costs are derived on the assumption that ACS costs are twice as high as non-ACS costs because approximately twice as many key strokes "are required for keying Non-ACS information as for keying ACS information." Please confirm that the note ought to disclose that one half as many keystrokes are required for keying non-ACS information as for keying ACS information.

- (a) If not confirmed, explain the logic of this assumption.
- (b) If confirmed, provide any evidence that you have that the assumption is valid.

RIAA/USPS-T-29-2. Please describe the methodology on which the "sample period" described in note 3 of Table 5.2.2. of LRI-110 was constructed, and provide the data on which the calculation of ACS 2nd/Generation/Nixie Hours/Piece was calculated.

RIAA/USPS-T-29-3. Please provide the sources for all values that are not calculated in column D of Table 5.2.2.2. of LRI-110.

RIAA/USPS-T-29-4. If an Undeliverable As Addressed letter has an eleven digit zip code and is barcoded, could the costs reported at Library Reference-I-160 Section A page 3 of 3 at notes 5 and 6 be avoided?

- (a) If your answer is in the affirmative, to what extent could such costs be avoided and what additional costs would be incurred?

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 Volner
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