

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

**RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS MOELLER TO INTERROGATORIES OF THE RECORDING
INDUSTRY ASSOCIATION OF AMERICA
(RIAA/USPS-T35—1-2)**

The United States Postal Service hereby provides the responses of witness Moeller to the following interrogatories of the Recording Industry Association of America: RIAA/USPS-T35—1-2, filed on February 24, 2000.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



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Attorney

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March 9, 2000

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MOELLER TO
INTERROGATORIES OF RECORDING INDUSTRY ASSOCIATION OF
AMERICA**

RIAA/USPS-T35-1. 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."

RESPONSE:

If the piece meets the DMM Section C050 definition of a flat, but is nonetheless prepared as a machinable parcel, it is this "characteristic" (being prepared as a parcel) that renders it subject to the surcharge. The machinable parcel shape definition is also in DMM Section C050, and the preparation rules are in DMM Section M610.6.2.

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RIAA/USPS-T35-2. 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.

RESPONSE:

If a piece is prepared as a parcel, it is generally handled as a parcel. See my response to RIAA/USPS-T35-1. For example, a machinable parcel presorted to BMC will be sorted on a parcel sorter, and will be processed in a parcel mailstream. (Also, presortation to BMC is not as fine as presortation to 3-digit, which would be required of a flat for the 3/5-digit rate.) Parcel processing and delivery is more costly than processing and delivery of the typical flat. So, the "characteristic" (being prepared as a parcel) results in increased costs.

DECLARATION

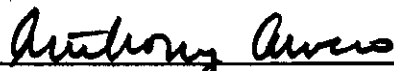
I, Joseph D. Moeller, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.


JOSEPH D. MOELLER

Dated: 3/9/00

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.



Anthony Alverio

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