

Before The  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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Postal Rate and Fee Changes

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Docket No. R2000-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
WITNESS CRUM TO INTERROGATORY OF  
RECORDING INDUSTRY ASSOCIATION OF AMERICA  
(RIAA/USPS-T27-1)

The United States Postal Service hereby provides the responses of witness  
Crum to the following interrogatory of the Recording Industry Association of America:  
RIAA/USPS-T27-1, filed on February 29, 2000.

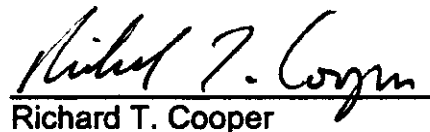
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

  
Richard T. Cooper

475 L'Enfant Plaza West, S.W.  
(202) 268-2993; Fax: -5402  
Washington, D.C. 20260-1137  
March 14, 2000

**U.S. POSTAL SERVICE WITNESS CHARLES L. CRUM  
RESPONSE TO INTERROGATORY  
OF RECORDING INDUSTRY ASSOCIATION OF AMERICA**

RIAA/USPS-T-27-1. Please provide the Cost Segment costs for each element within each Cost Segment on a per piece basis for IPPSs & Parcels in each of Tables 3.1, 3.2, 3.3 and 3.4.

**RESPONSE**

The data you ask for could be found by dividing the cost segment costs in the IPPs and Parcels column by the parcel Volume of Mail listed in the Distribution Keys section in each table. I have provided the attached sheet for your convenience. Please note that the purpose of my testimony is to estimate the total cost difference between parcels and flats in all of bulk Standard Mail (A). That data is contained in Table 3 and reproduced on page 10 of my testimony. I have provided Tables 3.1 through 3.4 because external parties expressed an interest in those numbers in Docket No. R97-1 and to present a more complete record.

ATTACHMENT TO WITNESS CRUM'S RESPONSE TO RIAA/USPS-T27-1

Parcel Unit Costs (cents)

<u>Segment</u>	<u>Table 3.1</u>	<u>Table 3.2</u>	<u>Table 3.3</u>	<u>Table 3.4</u>
C.S. 3.1 - Mail Processing	27.4	48.3	201.9	70.0
C.S. 3.2 - Window Service	0.0	0.3	0.3	0.4
C.S. 6&7 - City Delivery Carriers	45.5	16.1	18.5	17.4
C.S. 8 - Vehicle Service Drivers	0.7	1.8	1.6	1.6
C.S. 10 - Rural Delivery Carriers	0.3	2.1	0.3	1.6
C.S. 14 - Transportation	0.6	8.2	3.5	7.4
All Other Costs	0.1	0.0	0.1	0.0
<b>Total</b>	<b>74.6</b>	<b>76.8</b>	<b>226.2</b>	<b>98.4</b>

**DECLARATION**

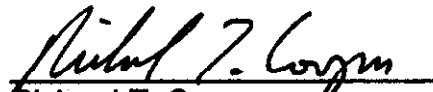
I, Charles L. Crum, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

  
CHARLES L. CRUM

Dated: 14 MARCH 2000

## 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.

  
Richard T. Cooper

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