

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

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OFFICE OF THE SECRETARY

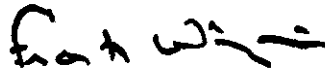
POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

INTERROGATORIES OF
RECORDING INDUSTRY ASSOCIATION OF AMERICA
TO USPS WITNESS CRUM
(RIAA/USPS-T-27-4)

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-27-4. 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-27-4. Please refer to your response to PSA/USPS-T-27-5. You there say "Also, ECR parcels require a detached label card."

(a) Please provide a DMM citation to the provision containing this requirement.

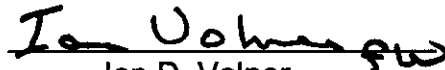
(b) Your answer goes on (in the same paragraph) to intimate though not really to say that this characteristic increases costs. Is this the conclusion that is intended by this portion of your answer?

(c) If so, please provide copies of, or citations to evidence in this case containing, all documentation and analysis on which you rely to support this conclusion.

(d) In subpart (d) of your response to this interrogatory you say that "unit cost data . . . has been consistent from year to year" and attach a table that shows the cost increasing by five cents between FY 1993 and FY 1994, decreasing by 3.3 cents between FY 1994 and FY 1995, decreasing by further 2.3 cents between FY 1995 and FY 1996 and increasing by 25.5 cents between FY 1996 and FY 1998. Please explain how these data support the quoted conclusion.

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