

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

Docket No. R2000-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE
WITNESS CRUM TO INTERROGATORY OF
RECORDING INDUSTRY ASSOCIATION OF AMERICA
(RIAA/USPS-T27-3)

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-T27-3, filed on March 15, 2000.

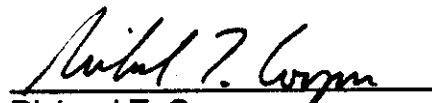
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


Richard T. Cooper

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Washington, D.C. 20260-1137
March 29, 2000

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

RIAA/USPS-T-27-3.

Please refer to your attachment to your answer to RIAA/USPS-T-27-1.

(a) Do you have an explanation for the disproportionately high mail processing cost reflected in Table 3.3?

(b) Do you have an explanation for the fact that cost segments 6 and 7 in Table 3.1 are substantially (almost three times) higher than those in Table 3.2 but the same costs are close to equal in Table 3.3 and 3.4?

RESPONSE

a. This is likely due to variability associated with the low volume of Nonprofit ECR parcels. In Fiscal Year 1998, Nonprofit ECR parcels constituted only about .2 percent of total bulk Standard Mail (A) parcels. Please also refer to my response to PSA/USPS-T27-5 (c).

b. The limited volume of Nonprofit ECR parcels discussed in my response to (a) makes it unlikely that comparisons involving Table 3.3 will yield useful information. The only other information I have related to this question can be found in my response to PSA/USPS-T27-5(a).

DECLARATION

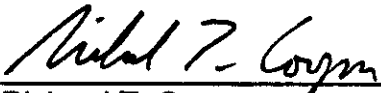
I, Charles L. Crum, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.


CHARLES L. CRUM

Dated: 29 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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