

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

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS TOLLEY TO INTERROGATORY OF
THE RECORDING INDUSTRY ASSOCIATION OF AMERICA
(RIAA/USPS-T6-1)

The United States Postal Service hereby provides the response of witness Tolley to the following interrogatory of the Recording Industry Association of America:
RIAA/USPS-T6-1, filed on March 16, 2000.

The 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



Eric P. Koetting

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March 30, 2000

**RESPONSE OF POSTAL SERVICE WITNESS TOLLEY
TO INTERROGATORIES OF RECORDING INDUSTRY ASSOCIATION OF AMERICA**

RIAA/USPS-T6-1 Do your Test Year After Rates (for example, Table 1 of USPS-T-6 at page 5) consider that the parcel surcharge proposed by witness Moeller (USPS-T-35 at 6-8) might result in the migration of eligible pieces (such as audio and video recordings) from the Standard A class of mail to Media Mail?

(a) If so, what do you calculate the amount of that migration to be and where does the migration effect appear in your testimony or supporting documents?

(b) If not, why not?

RESPONSE:

No.

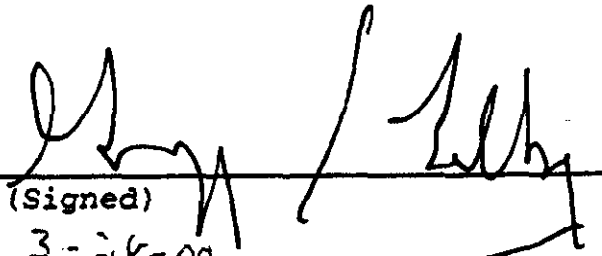
(a) Not applicable.

(b) The parcel surcharge was first introduced in Standard A in the second quarter of 1999, with the implementation of R97-1 rates. There has not been enough data since the implementation of R97-1 to enable one to quantify what, if any, migration may have occurred between Standard A and other classes of mail as a result of the imposition of this parcel surcharge.

It appears that, even with the parcel surcharge, it would be cheaper to send parcels weighing less than one pound as Standard A mail rather than as Media Mail in the overwhelming majority of cases, so I would not expect much migration anyway.

DECLARATION

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

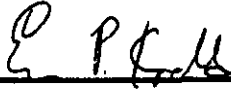

(Signed)

3-28-00

(Date)

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.



Eric P. Koetting

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