

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

FOLLOW-UP INTERROGATORY OF
RECORDING INDUSTRY ASSOCIATION OF AMERICA
TO USPS WITNESS MOELLER
(RIAA/USPS-T35-3)

Pursuant to Sections 25 and 26 of the rules of practice, the Recording Industry Association of America submits the attached follow-up interrogatory to USPS witness Moeller RIAA/USPS-T35-3. 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

April 10, 2000

RIAA/USPS-T35-3. Please refer to your response to DMC/USPS-T35-7 (filed April 6, 2000):

(a) In response to subpart i of that interrogatory you state that for "revenue estimation purposes" the volume of pieces estimated to receive the barcode discount in Standard Mail (A) Regular is 490 million. Please confirm that this number represents 76% of the net volume of "surchargeable pieces" as reflect in your workpaper 1, page 14. If you do not confirm, please state how the 490 million pieces set forth in your response to DMC/USPS-T-35-7(i) was derived.

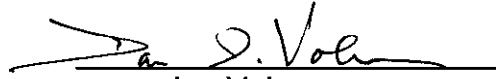
(b) Does your estimation of the number of pieces that will receive the barcode discount include any pieces that are deemed machinable pursuant to DMM C050.4.3? If so,, what percentage of the 490 million pieces set forth in your response to the DMC interrogatory are estimated to be eligible for the barcode on this basis, and how was such estimate derived?

(c) Please confirm that the 490 million pieces set forth in your response to the DMC interrogatory does not include any pieces that are estimated to be entered as flats. If you do not confirm, please explain your answer in detail.

(d) Is the reference to "revenue estimation purposes" contained in your response to subpart i of the DMC interrogatory meant to imply that, for purposes other than revenue estimation, different volumes and different estimates of the percentage of pieces that will receive the barcode discount were used? Please explain your answer in detail.

CERTIFICATION

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.



Ian Volner