

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 INTERROGATORIES OF
RECORDING INDUSTRY ASSOCIATION OF AMERICA
TO USPS WITNESS JOSEPH D. MOELLER
(USPS-T-35)

Pursuant to Sections 25 and 26 of the rules of practice, the Recording Industry Association of America submits the attached follow-up interrogatories to USPS witness Joseph D. Moeller, USPS-T-35. 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

May 23, 2000

RIAA/USPS-T35-4. Please refer to your Further Response to Questions Posed During Hearing (filed May 17, 2000) in which you provide certain information concerning the revenue, pieces and weight data for "pieces subject to the surcharge."

(a) Please provide copies of any workpapers, studies or other documents showing how the information in the table constituting your response has been derived.

(b) With respect to the Regular (Standard A) subclass, please disaggregate the revenue, pieces and weight shown for such subclass in the following format, corresponding to the format set forth at Schedule G-2 (page 2 of 2) of Library Reference USPS-LR-I-259:

Basic Residual-Shaped Pieces (piece rated) _____

No destination entry _____
BMC destination entry _____
SCF destination entry _____

Basic Residual-Shaped Pieces (pound rated) _____

No destination entry _____
BMC destination entry _____
SCF destination entry _____

3/5-Digit Residual-Shaped Pieces (piece rated) _____

No destination entry _____
BMC destination entry _____
SCF destination entry _____

3/5-Digit Residual-Shaped Pieces (pound rated) _____

No destination entry _____
BMC destination entry _____
SCF destination entry _____

(c) If you are unable to disaggregate the data set forth with respect to the Regular subclass in the form requested by subpart (b) of this interrogatory, please provide a detailed explanation of why that is so. If you are able to disaggregate such data, please describe how such disaggregation was performed, identify all sources used to perform such calculations and provide copies of all workpapers, studies or other documents upon which you rely in performing such disaggregation.

RIAA/USPS-T35-5. Please confirm that:

(a) The revenue, pieces and pounds reflected in Library Reference 259 for non-letters for the period January 10, 1999 "and beyond" (LR-259, Schedule G-2, page 2 of 2) includes the revenue, pieces and pounds of non-letters subject to the residual-shaped surcharge set forth in your Further Response;

(b) 27.9% of the total non-letters (Basic and 3/5) for the period January 10, 1999 "and beyond" constituted pieces subject to the residual-shaped surcharge as reflected in your Further Response;

(c) 43.2% of the total revenues derived from non-letters (Basic and 3/5) was derived from pieces that were subject to the residual-shaped surcharge in the period January 10, 1999 "and beyond".

(d) If you are unable to confirm any of subparts (a), (b) or (c) of this interrogatory, please state why that is so and provide what you consider to be the correct response, together with any workpapers, studies or supporting documents upon which you rely.

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