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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

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

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

**RESPONSES OF RECORDING INDUSTRY ASSOCIATION OF AMERICA
WITNESS GLICK TO INTERROGATORIES OF UNITED STATES POSTAL
SERVICE (USPS/RIAA-T1-1-2)**

Recording Industry Association of America hereby provides responses to the above listed interrogatories of the United States Postal Service filed June 14, 2000. Each question is stated verbatim and is followed by the response.

Respectfully submitted,



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June 28, 2000

USPS/RIAA-TI-1. Please refer to page 2, lines 2-14 of your direct testimony. On line 14, you cite page 7 of witness Moeller's testimony regarding use of a "traditional passthrough" approach described in the Recommended Decision in Docket No. MC95-1. Please provide the specific language from witness Moeller's testimony that refers to "traditional passthrough" as it is used in the cited passage from Docket No. MC95-1.

RESPONSE:

1. In the cited statement, I was making the point that Moeller used the Commission passthrough approach (i.e., ignoring revenue differences between flats and parcels) in determining the appropriate level of the surcharge. Moeller stated that he used this approach in lines 10-11 of page 7 of his testimony. It would have been clearer if I made reference to the PRC quotation on page 1 of my testimony.

The quotation on page 2 made the point that unless one performs an exact-piece comparison, one must correct for differences in cost-causing characteristics between the two types of mail being compared.

USPS/RIAA-TI-2. Is it your testimony that revenues will exceed costs for Standard Mail (A) parcels with the proposed surcharge? If so, please provide complete documentation of your calculations of the pertinent unit revenue and unit cost.

RESPONSE:

My testimony does not address this subject. Because I have not performed a detailed analysis of witness Crum's method for estimating Standard (A) nonletter costs by shape, I don't know whether Standard (A) parcel revenues exceed the true cost of Standard (A) parcels.

ATTESTATION

I, Sander Glick, declare under penalty of perjury that the foregoing answers to interrogatories were prepared by me or under my supervision and control and that such answers are true and correct, to the best of my knowledge, information and belief.

Sander Glick

Dated: 6/28/2008

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