

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

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POSTAL RATE AND FEE CHANGES  
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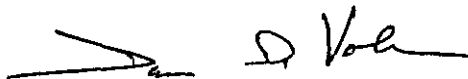
POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

INTERROGATORIES OF RECORDING INDUSTRY ASSOCIATION OF  
AMERICA TO WITNESS THRESS  
(RIAA/USPS-ST46-3-5)

Pursuant to Sections 25 and 26 of the rules of practice, Recording  
Industry Association of America ("RIAA") submits the attached interrogatories to  
USPS witness Thress: RIAA/USPS-ST46-3-5.

Respectfully submitted,



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Counsel for Recording Industry Association  
of America

Dated: July 31, 2000

**INTERROGATORIES OF RECORDING INDUSTRY ASSOCIATION OF  
AMERICA TO WITNESS THOMAS E. THRESS**

RIAA/USPS-ST46-3

Please refer to USPS-LR-I-436 at WP1, page 14 and USPS-LR-I-166 at WP1, p. 14:

(a) Please confirm that the entry "TYAR Volume Non-Letters" is exactly the same on both versions of this workpaper.

(b) Please confirm that WP1, p. 14 in LR-I-166 does not reflect any changes in Non-Letter volume and mix that may have resulted from the introduction of the rates that took effect on January 10, 1999.

(c) Please confirm that WP1, p. 14 in LR-I-436 purports to reflect results in the hybrid year FY1999 Quarter 3 to FY2000 Quarter 2.

(d) Please explain why the volume of TYAR Non-Letters has not changed in the two versions of WP1, p. 14 referenced in this interrogatory.

**INTERROGATORIES OF RECORDING INDUSTRY ASSOCIATION OF  
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RIAA/USPS-ST46-4

Please refer to footnote 2 of WP 1, p. 14 in LR-I-436 which states that the source for the 5.5% factor used to derive the (revised) "expected residual volume" is witness Moeller's response to RIAA/USPS-T35-5(b).

(a) Please confirm that the 5.5% factor is based upon the mix for a partial fiscal year and is applied to the TYAR volume Non-Letters for a full fiscal year to derive "expected residual volume." If you do not confirm, please explain your answer in detail and provide any supporting workpapers, studies or calculations upon which it is based.

(b) Please confirm that, according to RIAA/USPS-T35-4, the source of the data upon which the 5.5% factor reflected on WP1, p. 14 in LR-I-436 is "the disaggregated RPW subclass estimates for the GFY 1999 period." Please provide all source documents (including, as applicable, the disaggregated RPW subclass estimates for the GFY 1999 period) upon which the 5.5% factor reflected in footnote 2 of WP1, p. 14 in LR-I-436 is based.

(c) Is actual or estimated disaggregated subclass data comparable to that used to derive the response to RIAA/USPS-T35-5(b) available for any portions or all of the hybrid year FY1999 Quarter 3 to FY2000 Quarter 2? If so, please provide such data.

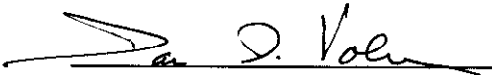
**INTERROGATORIES OF RECORDING INDUSTRY ASSOCIATION OF  
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RIAA/USPS-ST46-5

Please confirm that after deduction of "leakage" resulting from the proposed barcode discount, the expected revenue to be derived from the proposed 18 cent surcharge reflected in WP1, p. 14 in LR-I-436 is \$24.6 million greater than the expected revenue (after deduction of "revenue leakage") reflected in the version of such workpaper in LR-I-166. If you do not confirm, please explain your answer in detail and provide all supporting workpapers, studies or other documents upon which the answer is based.

## 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