

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, 2001

Docket No. R2001-1

INTERROGATORIES OF
THE RECORDING INDUSTRY ASSOCIATION OF AMERICA
TO USPS WITNESS MOELLER
(RIAA/USPS-T-32-1-3)

Pursuant to Sections 25 and 26 of the rules of practice, the Recording Industry Association of America submits the attached interrogatories to USPS witness Moeller: RIAA/USPS-T-32-1-3.

Respectfully submitted,



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Counsel for RIAA

October 18, 2001

RIAA/USPS-T32-1. Page N of your WP1 indicates (at n.2) that 4.683 percent of TYBR Volume Nonletters will be subject to the residual shape surcharge. Please display the numbers from USPS LR-J-98 G5,p.1 and G6,p.1 you employ to derive this number.

RIAA/USPS-T32-2. Your WP1 from R2000-1 shows (at page 14 n.2) that the number in that proceeding comparable to the 4.683% discussed above to have been 5.90% and assumed that the after rate percentage would be the same. Does the difference between the R2000-1 estimation of "% residual shape" and the R2001-1 estimation of that percentage imply that the assumption that there would be no change in the percentage between before rates and after rates was in error?

- (a) If so, why do you continue to employ the same assumption in this case?
- (b) If not, please fully explain why not.

RIAA/USPS-T32-3. Does the 4.683% number reflect any effect on volume consequent to the implementation of the increase in the surcharge in January of this year?

1. If not, does this fact suggest that the 4.683% estimation overstates the volume of mail that will be subject to the residual shape surcharge in the test year?
2. If not, please fully explain why not.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record to date in this proceeding in accordance with section 12 of the rules of practice.



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