

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

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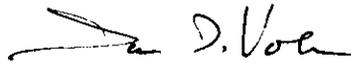
POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

INTERROGATORIES OF
RECORDING INDUSTRY ASSOCIATION OF AMERICA
TO USPS WITNESS SCHENK
(RIAA/USPS-T-43-1-5)

Pursuant to Sections 25 and 26 of the rules of practice, the Recording Industry Association of America submits the attached interrogatories to USPS witness Schenk: RIAA/USPS-T-43-1-5.

Respectfully submitted,



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Counsel for RIAA

November 9, 2001

RIAA/USPS-T43-1. Please refer to your response to PostCom/USPS-T43-2h. Has the Postal Service or any of its contractors performed any analysis to explain cost changes from R2000-1 to R2001-1 for Standard Regular or Non-Profit parcels for any weight ranges? If so, please provide a copy of each analysis.

RIAA/USPS-T43-2. Please refer to your responses to PostCom/USPS-T43-2m and PostCom/USPS-T43-2n concerning Test Year costs for Standard Regular and Non-Profit parcels provided in the Excel file LR58AREG.xls of LR-J-58.

- (a) Has the Postal Service calculated coefficients of variation for any Test Year unit costs for any weight ranges of Standard Regular and Non-Profit parcels? If so, please provide these coefficients of variation.
- (b) Please confirm that the Test Year unit costs for Standard Regular and Non-Profit parcels within each weight range result from dividing Test Year total cost for Standard Regular and Non-Profit parcels within each weight range by the corresponding Test Year total volume for Standard Regular and Non-Profit parcels within that weight range. If not confirmed, please explain fully.
- (c) Please confirm that the Test Year costs and volumes for Standard Regular and Non-Profit parcels within each detailed weight range result from applying the rollforward methodology to Base Year costs and volumes for Standard Regular and Non-Profit parcels within each detailed weight range. If not confirmed, please explain fully.
- (d) Please describe the rollforward adjustments that are performed to transform Base Year costs and volumes for Standard Regular and Non-Profit parcels into Test Year costs and volumes for Standard Regular and Non-Profit parcels.
- (e) Has the Postal Service calculated coefficients of variation for any Base Year costs or volumes for any weight ranges of Standard Regular and Non-Profit parcels? If so, please provide these coefficients of variation.

RIAA/USPS-T43-3. Please refer to the Excel file LR58AREG.xls of LR-J-58, worksheets "3CREG Flats (detailed)" and "3CREG Parcels (detailed)".

- (a) Please confirm that Standard mail (previously referred to as Standard (A) mail) must weigh less than 16 ounces. If not confirmed, please explain fully.
- (b) Please confirm that both of the two referenced worksheets include a column labeled "15 to 16+" that indicates the weight increment in ounces of the mail for which the column provides information. If not confirmed, please explain fully.

- (c) Please confirm that any mail weighing 16 ounces or more is incorrectly classified as Standard mail. If not confirmed, please explain fully.
- (d) For the two referenced worksheets, please provide a revised version of the volumes and costs listed in the column labeled "15 to 16+" that excludes all data for mail pieces weighing 16 ounces or more.

RIAA/USPS-T43-4. Please refer to your response to PostCom/USPS-T43-2r, in which you state that "[a]ll Standard Mail estimates in the Revenue, Pieces, and Weight Report derive from postage statement (also referred to as mailing statement) data."

- (a) Please provide a copy of the postage statements that were used for Standard Mail during Base Year R2000-1 and Base Year R2001-1.
- (b) Please describe in detail what data are entered into the RPW system that indicate the shape of mail. Please further describe in detail how the shape-related data entered into the RPW system are determined from each of the postage statements provided in (a).
- (c) Please describe in detail how the shape-related data in the RPW system were used to determine the shape of mail for the volume and weight data provided in LR-J-58 and LR-I-92.
- (d) Please describe in detail how the weight of mail to be entered into the RPW system is determined from each of the postage statements provided in (a).

RIAA/USPS-T43-5. Please refer to your response to PostCom/USPS-T43-2o, in which you refer to instructions for Question 22 in USPS-LR-I-14/R2000-1 for "provid[ing] documentation on how the In-Office Cost System (IOCS) defines a flat, an automation flat, a parcel, and an IPP." Please further refer to your response to PostCom/USPS-T43-2p, in which you refer to sections C050 and C820 of the Domestic Mail Manual for "provid[ing] documentation on how the Domestic Mail Manual defines a flat, an automation flat, a parcel, and an IPP."

- (a) Please confirm that an item with a length between 4 and 13 inches, a height between 4 and 12 inches, and a thickness greater than 0.75 inch but less than 1.25 inches does not satisfy the size definitions of a flat according to the instructions for Question 22 in USPS-LR-I-14/R2000-1 on page 12-10. If not confirmed, please explain fully.
- (b) Please confirm that section C050.3.2 of the current Domestic Mail Manual refers to section C820 for "dimensional criteria" for "automation-compatible flat-size mail." If not confirmed, please explain fully.

- (c) Please confirm that section C820.1.0 of the current Domestic Mail Manual states that pieces may qualify as automation-compatible flat-size mail under either the FSM 881 or FSM 1000 requirements. If not confirmed, please explain fully.
- (d) Please confirm that an item with a length between 4 and 13 inches, a height between 4 and 12 inches, and a thickness greater than 0.75 inch but less than 1.25 inches satisfies the size definitions of an automation-compatible flat-size mail piece according to the FSM 1000 requirements in section C820.3.3 of the current Domestic Mail Manual. If not confirmed, please explain fully.
- (e) If you have confirmed in (d) that the item described in (d) satisfies the size definitions of an automation-compatible flat-size mail piece according to the FSM 1000 requirements, please provide a detailed list of the additional requirements that the item must satisfy in order to meet the full requirements of an automation-compatible flat-size mail piece under FSM 1000 requirements. For each of the requirements listed, please further provide a description of the decision criteria that an IOCS data collector uses to determine if a mail piece satisfies the requirement.
- (f) Please confirm that the current definition of the size requirements for FSM 1000 automation-compatible flat-size mail became effective on October 4, 1998.
- (g) Please describe how an IOCS data collector determines the weight of a flat or parcel for an IOCS reading.

CERTIFICATE OF SERVICE

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

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