

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

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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-32-4-5)

Pursuant to Sections 25 and 26 of the rules of practice, the Recording Industry Association of America submits the attached interrogatories to USPS witness Moeller: RIAA/USPS-T-32-4-5.

Respectfully submitted,



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Counsel for RIAA

November 9, 2001

**RIAA/USPS-T32-4.** In your answer to RIAA/USPS-T32-2 you say “in absence of a specific forecast, the most reasonable course is to follow the established method....” Please supply a citation to the document or documents that established that method and to documents reflecting the use of that method prior to your invocation of it.

**RIAA/USPS-T32-5.** Your answer to RIAA/USPS-T32-3 concludes by saying “using the fixed percentage implies that RSS and non-RSS pieces were affected similarly by the rate increase.”

- (a) Were the two categories of pieces (RSS and non-RSS) subject to the same percentage increase in rates as a result of the January rate increase?
- (b) If not, please explain why you believe them to have been “affected similarly by the rate increase.”

**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.

*Paul Wiggins*  
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