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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
RECORDING INDUSTRY ASSOCIATION OF AMERICA
TO USPS WITNESS SCHENK
(RIAA/USPS-T-43-6-7)**

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-43-6-7.

Respectfully submitted,



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November 20, 2001

RIAA Interrogatories to Witness Schenk USPS-T-43

RIAA/USPS-T43-6. In LR-J-58, please refer to worksheet "Table 5" in Excel file LR58STDCBS.xls, worksheet "Table 5" in Excel file LR58STDCBS1.xls, and worksheet "Table 6" in Excel file LR58ADJ.xls. Please further refer to USPS-T-32, page 10, footnote 11.

- (a) Please confirm that the citation to Table 6 in USPS-T-32, page 10, footnote 11 (in the sentence containing the passage "Table 6 has the unadjusted parcel-flat differential of 93.4 cents") is an incorrect citation to worksheet "Table 5" in the Excel file LR58STDCBS.xls. If not confirmed, please explain fully.
- (b) Please confirm that the citation to Table 7 in USPS-T-32, page 10, footnote 11 (in the sentence containing the passage "Table 7 has the adjustment for presort and destination entry profile of 9.5 cents") is an incorrect citation to Table 6 in the Excel file LR58ADJ.xls. If not confirmed, please explain fully.
- (c) Please confirm that the worksheet "Table 5" in Excel file LR58STDCBS1.xls provides a version of "Table 5" in Excel file LR58STDCBS.xls that calculates costs separately for "Regular" and "ECR" Standard Mail. Please confirm further that the "Regular" column includes costs for both the Regular and Nonprofit subclasses, and that the "ECR" column includes costs for both the Enhanced Carrier Route and Nonprofit Enhanced Carrier Route subclasses. If not confirmed, please explain fully.
- (d) Please confirm that the worksheet "Table 6" in Excel file LR58ADJ.xls calculates presort and dropship cost differences for Standard Mail for all four subclasses together. If not confirmed, please explain fully.
- (e) Please provide a version of the worksheet "Table 6" in Excel file LR58ADJ.xls that calculates the presort and dropship cost differences for only the Regular and Nonprofit subclasses of Standard Mail. If data are not available for calculating the entire table for these two subclasses, please provide those portions of the table for which data are available for the Regular and Nonprofit subclasses.

RIAA/USPS-T43-7. Please refer to your responses to PostCom/USPS-T43-2m and PostCom/USPS-T43-2n concerning Test Year costs for Standard Regular and Nonprofit parcels provided in the Excel file LR58AREG.xls of LR-J-58. Please further refer to Presiding Officer's Information Request No. 5/12 and to the generalized variance function (GVF) approach to calculating coefficients of variation that was used by witness Ramage in R2000-1 to respond to interrogatory ANM/USPS-T2-13 (Docket R2000-1, Tr. 4/1116). Using the GVF

approach used by witness Ramage in R2000-1 and requested in POIR 5/12, please calculate coefficients of variation for each combined weight increment of the IOCS-based Test Year costs for Standard Regular and Nonprofit parcels provided in worksheet "3CREG Parcels (combined)" in the Excel file LR58AREG.xls of LR-J-58.

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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