

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

**NOTICE OF RECORDING INDUSTRY ASSOCIATION OF AMERICA
OF INTENT TO CONDUCT CROSS-EXAMINATION OF
WITNESS SHAW (USPS-T-1)**

The Recording Industry Association of America ("RIAA") gives this notice that it intends to conduct oral cross-examination of United States Postal Service witness Shaw when he appears on December 14, 2001. RIAA will examine witness Shaw on his answers to RIAA/USPS-T43-5 (redirected from witness Schenk). Two copies of the interrogatory and response are associated with this pleading.

Respectfully submitted,




Ian D. Volner
N. Frank Wiggins
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1201 New York Avenue, N.W.
Suite 1000
Washington, DC 20005-3917

Counsel to Recording Industry
Association of America

December 10, 2001

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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December 10, 2001

BEFORE THE
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POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS SHAW TO INTERROGATORY OF RECORDING INDUSTRY
ASSOCIATION OF AMERICA
REDIRECTED FROM WITNESS SCHENK
(RIAA/USPS-T43-5)

The United States Postal Service hereby provides the response of witness Shaw to the following interrogatory of Recording Industry Association of America: RIAA/USPS-T43-5, filed on November 9, 2001. Interrogatory RIAA/USPS-T43-5 was redirected from witness Schenk.

The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

Kenneth N. Hollies

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-3083 Fax -5402
November 21, 2001

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS SHAW TO
INTERROGATORY OF RECORDING INDUSTRY ASSOCIATION OF AMERICA
(REDIRECTED FROM WITNESS SCHENK)

RIAA/USPS-T43-5. Please refer to your response to PostCom/USPS-T43-20, 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 CO50 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.

...

e. ... 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.

...

g. Please describe how an IOCS data collector determines the weight of a flat or parcel for an IOCS reading.

RESPONSE:

a. Confirmed.

e. IOCS data collectors do not collect mailpiece characteristics that are specific criteria for processing automation-compatible flats through FSM 1000 or FSM 881 machinery.

g. IOCS data collection instructions for recording weight are found in USPS-LR-I-14/R2000-1, page 16-1. For mail pieces weighing over 4 ounces, data collectors are asked to locate a scale that measures in ounces within the facility. Generally, a scale will be located at the window function or at an IOCS staging area in the facility. For mail pieces 4 ounces or less, data collectors generally carry a hand-held scale that measures by half ounce increments.

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I hereby certify that I have this day 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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