

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

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS SCHENK TO INTERROGATORY OF
THE RECORDING INDUSTRY ASSOCIATION OF AMERICA
(RIAA/USPS-T43-9)

The United States Postal Service hereby provides the responses of witness Schenk to the following interrogatory of the Recording Industry Association of America: RIAA/USPS-T43-9, filed on December 14, 2001.

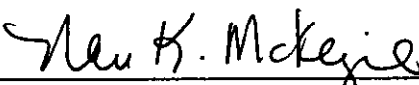
The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Nan K. McKenzie

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
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January 3, 2002

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS SCHENK
TO INTERROGATORIES OF THE RECORDING INDUSTRY
ASSOCIATION OF AMERICA

RIAA/USPS-T43-9. Please compare Attachment A to your response to RIAA/USPS-T43-7 and Attachment to number 12 associated with your response to POIR 5 question 12 with LR-J-58, LR58AREG.xls, 3CREG Parcels (combined) rows 8, 9 and 10. Please explain the considerable discrepancy between the first two sources and the third.

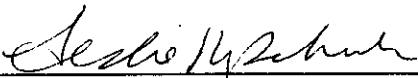
RESPONSE:

Sheet 3CREG Parcels (combined), rows 8-10 in LR58AREG.xls provide test year mail processing (cost segment 3.1), window service (cost segment 3.2), and city carrier (cost segment 6.1) costs for Standard Mail (commercial and nonprofit) parcels. The cost figures presented in Attachment A to my response to RIAA/USPS-T43-7 are also for Standard Mail (commercial and nonprofit) parcels and for the same cost segments, but they are base year costs. The coefficients of variation given in Attachment A of my response to RIAA/USPS-T43-7 can also be applied to test year costs.

The Attachment to my response to POIR 5 question 12 provides costs and coefficients of variation for First-Class Mail (all shapes), and is therefore not related to either Attachment A to my response to RIAA/USPS-T43-7 nor to LR-J-58, LR58AREG.xls.

DECLARATION

I, Leslie M. Schenk, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

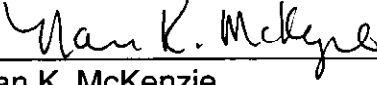


Leslie M. Schenk

Dated: 1/3/02

CERTIFICATE OF SERVICE

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.



Nan K. McKenzie

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