

DOCKET SECTION

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

RECEIVED

JAN 15 4 48 PM '98

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

UNITED STATES POSTAL SERVICE
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO
THE RECORDING INDUSTRY ASSOCIATION OF AMERICA WITNESS ANDREW
(USPS/RIAA et al.-T1-1-6)

Pursuant to rules 25 and 26 of the Rules of Practice and Procedure and rule 2 of the Special Rules of Practice, the United States Postal Service directs the following interrogatories and requests for production of documents to the Recording Industry Association of America witness Andrew: USPS/RIAA et al.-T1-1-6.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Scott L. Reiter

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2999; Fax -5402
January 15, 1998

INTERROGATORIES OF UNITED STATES POSTAL SERVICE
TO RIAA ET AL. WITNESS ANDREW

RIAA et al.-T1-1. On page 23 of your testimony, you discuss the physics of granular materials. Please provide a dictionary definition of the term "granular", and "granule".

RIAA et al.-T1-2. Please refer to the scientific articles regarding physics of granular materials provided in Library Reference RIAA-LR-1.

- (a) Please confirm that the focus of investigation by Duran, et. al. was on disks and/or beads. If not confirmed, please explain.
- (b) Please confirm that the MRI observations by Ehrichs, et. al. were on convection in a column of poppy seeds. If not confirmed, please explain.
- (c) Please confirm that the experimental observations discussed by Jaeger, Nagel and Behringer included pyrex spheres, poppyseeds, sand and brass spheres. If not confirmed, please explain.
- (d) Please confirm that the experimental observations reported by Jager and Nagel in "Physics of the Granular State" concerned sandpiles, cereals and disks. If not confirmed, please explain.
- (e) Please confirm that the model developed by Jullien and Meakin used spheres. If not confirmed, please explain.
- (f) Please confirm that the experimental observations of Knight, et. al. used glass beads. If not confirmed, please explain.
- (g) Please confirm that the simulation by Rosato, et. al. was based on disks. If not confirmed, please explain.
- (h) Do you have any reason to doubt the veracity of Jaeger and Nagel's statement (p.1524) that "... flow characteristics of granular material are determined by the geometrical packing of constituent particles." ? If so, please explain fully.
- (i) Do you have any reason to doubt the veracity of Jaeger and Nagel's statement (p. 1527) that "[f]aceted grains are much more likely to interlock."?

RIAA et al.-T1-3. Are you a physicist? Please provide evidence of any degrees, honorary or otherwise, conferred upon you in the field of physics.

RIAA et al.-T1-4. In the field of granular physics, how many articles, authored or coauthored by you, have been published in scientific journals? Please provide copies of all such articles.

RIAA et al.-T1-5. Are you aware of any studies or experimental observations of the flow characteristics, convection or trapping which occurs when faceted objects of a size and shape similar to those found in the mailstream are subjected to vibrations similar to those normally supplied by transportation and handling of mail containers? If so, please provide complete documentation of those studies or experiments.

RIAA et al.-T1-6. Please provide your understanding of the term "convection" that you use on page 23 of your testimony.

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.

A handwritten signature in cursive script, appearing to read "Scott L. Reiter", written over a horizontal line.

Scott L. Reiter

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
January 15, 1998