

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

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

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UNITED STATES POSTAL SERVICE
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO
THE RECORDING INDUSTRY ASSOCIATION OF AMERICA WITNESS MONASTRO
(USPS/RIAA et al.-T2-1-6)

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 et al. witness Monastro: USPS/RIAA et al.-T2-1-6.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
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January 28, 1998

USPS/RIAA et al.-T2-1. Please refer to page 4, lines 4-7, of your testimony. You state: "Merchandise Return Label Service may have been intended as a response to the problem of resealed parcels, but experience has shown – and our recent investigation confirms – that this service is cost effective only in case of very expensive products".

- (a) Please describe in detail the investigation you conducted concerning Merchandise Return Service and the procedures you used in that investigation.
- (b) Please provide all information, analyses, and results of this investigation.
- (c) Please describe in detail the "experience" that shows that Merchandise Return Service is "cost effective *only* in the case of very expensive products." (emphasis added).
- (d) By "this service is only cost effective only in the case of very expensive products," whose costs are you referring to, the mailers or the customers?
- (e) How is using a Merchandise Return Service label more expensive to use than taking the parcel to the post office and paying for the postage at the window?

USPS/RIAA et al.-T2-2. Please refer to page 6 of your testimony. Please confirm that the proposed Bulk Merchandise Re-deposit Service is an optional service.

USPS/RIAA et al.-T2-3. Please refer to page 8 of your testimony. Please confirm that under your proposal, the annual minimum pieces of returned parcels is 10,000 pieces per site. If not, please explain.

USPS/RIAA et al.-T2-4.

- (a) Is it your understanding that the Postal Service would incur some costs for billing and trust fund accounting in operating the proposed Bulk Merchandise Re-deposit Service?
- (b) Please explain why you did not propose a a per-piece fee for billing and trust fund accounting similar to the fee paid to cover Business Reply Mail billing and trust fund accounting.

USPS/RIAA et al.-T2-5. Please refer to page 7 of your testimony. You state: "Bulk Merchandise Re-Deposit Service will provide the Postal Service with a revenue stream that is directly and explicitly related to the cost of accepting, processing and transport the mail."

- (a) Do you have any cost data to show that this proposed service will cover its costs?
- (b) If so, please present this data and explain in detail any procedures you used to collect it.
- (c) If you cannot present any cost data, please explain fully how you reached the conclusion that the proposed service would cover its costs.

USPS/RIAA et al.-T2-6. Please refer to page 8 of your testimony. You state: "Rating pieces at the single piece rate will provide more than sufficient margin to assure that no other category of mailers is burdened with costs that they did not cause."

- (a) Please present any and all cost data you have to support this statement.
- (b) Please explain the assumptions you made to arrive at this conclusion.

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.



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