

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

CORRECTED RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS
L. PAUL LOETSCHER (USPS-T-28) TO INTERROGATORY OF
TIME WARNER, INC. (TW/USPS-T28-15(d)) (ERRATA)
(June 23, 2006)

The United States Postal Service hereby provides the corrected response of witness Loetscher (USPS-T-28) to the following interrogatory of Time Warner, Inc., filed on June 7, 2006:

TW/USPS-T-28-12-15(d)

The entirety of TW/USPS-T28-15 is attached, and should replace the response to TW/USPS-T28-15 that was filed on June 21, 2006. The interrogatory is stated verbatim and is followed by the response. The responses to 15 (a)-(c) are unchanged.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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RESPONSE OF USPS WITNESS LOETSCHER (USPS-T-28) TO
INTERROGATORY OF TIME WARNER, INC.

Modified June 23, 2006

TW/USPS-T28-15 Please refer to the spreadsheet you provided in response to
TW/USPS-T28-1-11.

- a. Please confirm that according to Table 1 in that spreadsheet, the total number of letter shaped Outside County Periodicals in FY2005 was 98,218,775.
- b. Please confirm that according to Table 9 in that spreadsheet, the total number of flats shaped Outside County Periodicals in FY2005 was 8,207,322,096.
- c. Please confirm that subtracting the letter and flats shaped Outside County pieces from the total given indicated by the FY2005 billing determinants in LR-L-77 gives 1,788,707, and that this is the number of parcel shaped Periodicals pieces in FY2005. If not confirmed, what was the number of parcel shaped pieces?
- d. In your response to TW/USPS-T28-2c you indicate that parcels are 0.4% of the Outside County volume. But the parcel volume indicated above is only 0.0215% of the total. What is the correct percentage and why?

RESPONSE:

- a. Confirmed.
- b. Confirmed.
- c. Confirmed.
- d. **The 0.4 percent estimate is the ODIS/RPW sample estimate of the proportion of Periodicals that are parcels (See PSA/USPS-T13-3). The letter and flat volumes that I refer to in my response to TW/USPS-T28-1-11 refer the PostalOne mailing statement based RPW by Shape volumes (USPS-LR-L- 87). The RPW by Shape estimates assign shape to pieces**

RESPONSE OF USPS WITNESS LOETSCHER (USPS-T-28) TO
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Modified June 23, 2006

Response to TW/USPS-T28-15 (continued)

based on the shape of the copy. It is my understanding the ODIS-RPW sample uses a similar procedure. Therefore, I cannot explain the discrepancy.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with Section 12 of the Rules of Practice and Procedure.

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