

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

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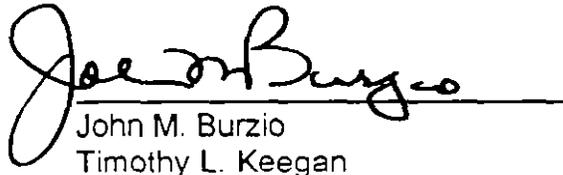
Docket No. R97-1
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE & FEE CHANGES, 1997

INTERROGATORY OF TIME WARNER INC.
TO UNITED STATES POSTAL SERVICE WITNESS TAUFIQUE: TW/USPS-T34-1
(September 15, 1997)

Pursuant to sections 25 and 26 of the Rules of Practice, Time Warner Inc. (Time Warner) directs the following interrogatory to United States Postal Service witness Taufique (USPS-T-34). If witness Taufique is unable to respond, we request that a response be provided by an appropriate person capable of providing an answer.

Respectfully submitted,


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CERTIFICATE OF SERVICE

I hereby certify that I have this day served the instant document on all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.


Timothy L. Keegan

September 15, 1997

INTERROGATORY TO WITNESS TAUFIQUE (USPS-T-34)

TW/USPS-T34-1 The following table shows the breakdown of the FY96 regular rate Periodicals volume by presort and automation categories, as given in the billing determinants and in LR-H-134. While the volume categories given are obviously distinct, since they add up to the total subclass volume in FY96, the distinctions between certain categories are not obvious from their description.

FY 1996 BILLING DETERMINANTS PERIODICALS REGULAR RATE & SCIENCE OF AGRICULTURE <i>(From LR-H-145)</i>	
PIECE RATED W/Discount	
Presort Rates:	6,978,325,228
LEVEL A NON-AUTOMATION	758,910,544
BASIC NON-AUTOMATION	199,089,110
LEVEL A ZIP+4 NUMERIC	2,357,823
BASIC AUTOMATION LETTER	9,205,104
LEVEL A PREBARCODED LETTERS	19,975,455
LEVEL A PREBARCODED FLATS	274,555,711
BASIC AUTOMATION FLAT	84,550,564
LEVEL B3 NON-AUTOMATION	333,524,496
B3 NON-AUTOMATION	288,082,287
LEVEL B3 ZIP-4 NUMERIC	477,441
B3 AUTOMATION LETTER	5,882,586
LEVEL B3 PREBARCODED LETTERS	3,305,294
LEVEL B3 PREBARCODED FLATS	269,219,641
B3 AUTOMATION FLAT	290,247,033
LEVEL B5 NON-AUTOMATION	875,356,501
CARRIER ROUTE BASIC	517,166,437
LEVEL B5 ZIP-4 NUMERIC	2,087,031
CARRIER ROUTE HIGH DENSITY	4,608,008
CARRIER ROUTE SATURATION	5,914,564
LEVEL B5 PREBARCODED LETTERS	22,024,749
LEVEL B5 PREBARCODED FLATS	795,153,850
CARR-RTE PRESORT BASIC (C1)	2,191,731,345
CARR-RTE PRESORT 125-PIECE WALK SEQ. (C2)	14,768,100
CARR-RTE PRESORT SATURATION (C3)	10,131,552

Please describe the distinct meaning of each volume category in this table, including a description of how each was measured. In particular:

- a. What is the difference between the 517,166,437 pieces called "CARRIER

ROUTE BASIC" and the 2,191,731,345 pieces called "CARR-RTE. PRESORT BASIC (C1)"? Is there any difference in the way these two categories are made up? How were the two volumes measured?

b. Please answer the same question for the two categories of high density carrier route and the two categories of saturation carrier route..

c. Why are some categories referred to as "automation" and some as "pre-barcoded"? Does this reflect any difference in make-up?.

d. Why are some categories referred to as "Level A" and some as "Basic", when it appears that all these categories add up to what is currently named "Level A"?

e. What is the difference between the categories named B3, B5 and 3/5?

f. Which volumes are based (1) on RPW only; (2) on RPW combined with data from LR-H-190; and (3) some other combination of data? Please explain.

g. Do the breakdowns of the Level A and Level B volumes in the table provide a key as to what will be respectively basic, 3-digit and 5-digit under the proposed new presort categories? If yes, please explain.