

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

Postal Rate and Fee Changes

Docket No. R2006-1

SECOND SET OF INTERROGATORIES OF TIME WARNER INC.
TO UNITED STATES POSTAL SERVICE WITNESS LOETSCHER
(TW/USPS-T28-12-16)
(June 7, 2006)

Pursuant to sections 25, 26 and 27 of the rules of practice, Time Warner Inc. directs the following interrogatories to United States Postal Service witness Loetscher (USPS-T-28).

If witness Loetscher is incapable of providing an answer to any question, it is requested that an answer be provided by the Postal Service as an institution or by another person capable of providing an answer.

Respectfully submitted,

s/ _____
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SECOND SET OF INTERROGATORIES TO WITNESS LOETSCHER (USPS-T-28)

TW/USPS-T28-12 In your response to TW/USPS-T28-1 d-e you state:

“The volumes in Tables 1 and 2 are FY 2005 Outside County volumes as reported on 3541 postage statements and recorded in PostalOne. These volumes include all shapes but exclude volumes for publications for which no issue frequency information was available and publications entering mail at facilities that are not on the PostalOne system.”

- a. Please confirm that sum of the sampling “universe” over all strata in Table 2 of LR-L-91 is 8,155,579,420, and that this is also the sum of all strata volumes indicated in the spreadsheet filed with your response to TW/USPS-T28-1-11.
- b. Please confirm that the total Outside County volume, according to the FY2005 billing determinants in LR-L-77, is 8,307,329,578.
- c. Please confirm that the difference between total Outside County volume and the sum of volumes in your sampling strata is 151,750,158. Please confirm also that this is the total Outside County volume for “publications for which no issue frequency information was available and publications entering mail at facilities that are not on the PostalOne system.” If not confirmed, please explain fully.
- d. How does the Postal Service determine the volume for “publications for which no issue frequency information is available and publications entering mail at facilities that are not on the PostalOne system”?
- e. Is the volume of the publications referred to in parts c and d above known only in the aggregate, or can it be determined also for each of your 30 (36) strata? If the volume of such publications is known by stratum, please provide it.

TW/USPS-T28-13

- a. Please confirm that Periodicals are required to provide “issue frequency information” by filing USPS form 3526 (Statement of Ownership, Management and Circulation) annually.

- b. If form 3526 information is not available, is it possible that the given Periodical no longer is being published?

TW/USPS-T28-14 In Docket No. C2004-1, witness Tang provided, in response to interrogatory TW et al./USPS-RT2-9 (Tr. 6/2194-98), the following statistics:

Total unique USPS publication numbers:	26,318
Publications with only In County volume:	77
Publication No.s with missing 3526 information:	1,124

Please provide similar current statistics.

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?

TW/USPS-T28-16 Please refer to the spreadsheet you provided in response to TW/USPS-T28-1-11.

- a. Please confirm that according to Table 10, the total number of advertising pounds in all zones is 1,577,154,694.
- b. Please confirm that according to Table 11, the total number of editorial pounds in all zones is 2,139,144,828.
- c. Please confirm that, according to the FY2005 billing determinants in LR-L-77, the total number of Outside County advertising pounds is 1,605,188,997 and the total number of Outside County editorial pounds is 2,167,597,328.
- d. Are the numbers in Tables 10 and 11 smaller than the numbers indicated by the billing determinants because:

- (1) they represent flats only;
- (2) they are not fully aggregated to reflect the total Outside County volume: or
- (3) for any other reason (please explain)?