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

POSTAL RATE AND FEE CHANGES	Docket No. R2006-1

OBJECTION AND PARTIAL OBJECTION OF THE
UNITED STATES POSTAL SERVICE TO
INTERROGATORY OF TIME WARNER INC. TO
UNITED STATES POSTAL SERVICE WITNESS L. PAUL LOETSCHER
(TW/USPS-T28-17 b and d)
(June 26, 2006)

The United States Postal Service hereby files an objection to subpart b, and a partial objection to subpart d, of the following interrogatory filed by Time Warner, Inc. on June 14, 2006:

TW/USPS-T28-17 b and d

The interrogatory is reprinted below, and is followed by the bases for these objections.

This interrogatory reads as follows:

TW/USPS-T28-17 Please refer to your answers to TW/USPS-T28-1 regarding the similarities and differences between the study you presented in LR-K-91 in Docket No. R2005-1 and the corresponding study presented in LR-L-91 in the present docket. Please refer also to Tables 3 and 4 in LR-K-91 entitled respectively "FY 2004 Periodicals Outside County Distribution of Sacks by Presort Level and Number of Pieces" and "Periodicals Outside County Pieces in Under 24 Piece Sacks By Modeled Presort Rate."

a. Please confirm that it is possible, based on the information you collected for the LR-L-91 study, to produce tables similar to Tables 3 and 4 in LR-K-91. If not confirmed, please explain.

b. Please produce tables similar to Tables 3 and 4 in LR-K-91, in spreadsheet form, using the most current data.

c. Please confirm that the type of information referred to in parts a and b above is needed to derive the conclusions you present in Table 5 of LR-L-91, regarding the number of Periodicals sacks (in FY2005) that

had less than 24 pieces in them, and the average number of pieces in different types of sacks.

d. Please explain how you did derive the estimates in Table 5 of LR-L-91 and provide any data necessary to replicate the derivation of those estimates that have not already been filed in your testimony or in response to other interrogatories.

The Postal Service objects to subpart (b) on the bases of relevance and burden. As the answer to subpart (a) of this interrogatory, which is being filed today, indicates, it was not necessary to develop tables similar to Tables 3 and 4 of LR-K-91 in order to derive the estimates that witness Loetscher presented in Table 5 of LR-L-91. Moreover, the Postal Service estimates that it would take 35-45 work hours to produce the requested tables. The Postal Service submits that it should not be required to produce a table that is unnecessary, and irrelevant, and that would impose such a burden.

The Postal Service partially objects to (d) on the basis of commercial sensitivity and proprietary information. This subpart seeks "any data necessary to replicate the derivation of th[e] estimates" in Table 5 of LR-L-91. The underlying study relied on postage statement data and mail.dat data, which were matched together. Even if the Postal Service were to recode individual publication ID's, the nature of the periodicals industry is such that a person with industry knowledge could identify at least the larger mailers. Such a person could map those mailers back to mail.dat data to learn about a competitor's mail preparation, as well as the locations of subscribers to a competitor.

The Postal Service is filing its response to TW/USPS-T28-17 a, c-d, today, and respectfully submits that the there is no need for additional work to be imposed on it, as sought by subpart b, and that publishers could be harmed by the release of the

information sought in subpart (d). For these reasons, the Postal Service objects to TW/USPS-T28 (b) and partially objects to TW/USPS-T28 (d).

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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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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