

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

COMPLAINT OF TIME WARNER INC. ET AL.
CONCERNING PERIODICALS RATES

Docket No. C2004-1

RESPONSES OF TIME WARNER INC. ET AL.
WITNESS HALSTEIN STRALBERG TO NNA-TW ET AL.-T1-37-40,
REDIRECTED FROM WITNESS MITCHELL
(June 28, 2004)

Time Warner Inc., Condé Nast Publications, a Division of Advance Magazine Publishers Inc., Newsweek, Inc., The Reader's Digest Association, Inc., and TV Guide Magazine Group, Inc. (collectively, Time Warner Inc. et al.) hereby provide the responses of witness Stralberg (TW et al.-T-2) to McGraw-Hill interrogatories NNA/TW et al.-T1-37-40, redirected from witness Mitchell, filed June 14, 2004.

Each interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

s/

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**RESPONSE OF WITNESS STRALBERG (TW et al.-T-2) TO NNA/TW et al.-T1-37,
REDIRECTED FROM WITNESS MITCHELL**

NNA/TW et al.-T1-37. Do you consider the FSM1000 to be a mechanized or automated sorting machine, or neither? Please explain your response.

NNA/TW et al.-T1-37. The FSM-1000 can be used in either a mechanized or automated mode. The mechanized mode is applied to pieces that cannot be processed in the automated mode.

**RESPONSE OF WITNESS STRALBERG (TW et al.-T-2) TO NNA/TW et al.-T1-38,
REDIRECTED FROM WITNESS MITCHELL**

NNA/TW et al.-T1-38. Do you believe an AFSM100 machine is capable of sorting newspapers? Please explain your response.

NNA/TW et al.-T1-38. Whether an AFSM-100 machine could process newspapers might depend on the particular characteristic of the newspaper. However, my understanding is that newspapers generally are not sorted on the AFSM-100 machines. I believe one concern with newspapers is the possibility that they might be torn by the strong suction power used in the AFSM-100's high-speed automated induction system. Torn front pages have been a problem for magazines as well, but I believe there has been some progress in addressing that problem.

Please see also my response to ABM/TW et al. T2-9.

**RESPONSE OF WITNESS STRALBERG (TW et al.-T-2) TO NNA/TW et al.-T1-39,
REDIRECTED FROM WITNESS MITCHELL**

NNA/TW et al.-T1-39. Do you believe an AFSM100 machine is used for sorting newspapers? Please explain your response.

NNA/TW et al.-T1-39. Please see my response to NNA/TW et al.-T1-38.

**RESPONSE OF WITNESS STRALBERG (TW et al.-T-2) TO NNA/TW et al.-T1-40,
REDIRECTED FROM WITNESS MITCHELL**

NNA/TW et al.-T1-40. If you believe an AFSM100 machine is either not capable of sorting newspapers or is not actually used for sorting newspapers, do you believe the design of the machine or the operational practice were intentionally directed away from potential use for newspaper mail? Please explain your response.

NNA/TW et al.-T1-40. My impression from the facilities I have visited in recent years is that facility managers are eager to put as much volume on those machines as possible and that they often will process flats with characteristics well outside the official parameters defining AFSM-100 machinability. On the other hand, there is obviously a concern with mail pieces that might be torn or that might cause jams in the machines.

Regarding the intentions of people who designed the machines in the first place, I really cannot speculate. I believe engineers are still tinkering to try to improve the automated induction system. Note also that in order to make its dreams of automating the carrier sequencing of flats come true, the Postal Service will need to produce a high-speed induction system that allows for the induction of all flats. My impression is that it is not there yet.