

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

**Complaint of Time Warner, Inc. *et al.*
Concerning Periodical Rates**

Docket No. C2004-1

**FOLLOW_UP INTERROGATORIES AND REQUEST FOR THE PRODUCTION
OF DOCUMENTS OF AMERICAN POSTAL WORKERS UNION, AFL-CIO
(APWU)
TO TIME WARNER WITNESS ROBERT W. MITCHELL
(APWU/TW et al. -T1-4,5)**

(July 2, 2004)

Pursuant to Sections 25 and 26 of the Rules of Practice, The American Postal Workers Union, AFL-CIO (APWU) directs the following interrogatories and request for production of documents to Time Warner et al. witness Robert W. Mitchell (TW et al.-T1). If the witness is unable to respond to any interrogatory, APWU requests that a response be provided by an appropriate person(s) capable of providing an answer.

Respectfully submitted,

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APWU/TW et al.-T1-4

To the extent that you cannot answer any part of this inquiry, please refer it to someone who can. Please refer to your response to APWU/TW et al.-T1-2.

- a) Can we assume that none of the complainants in this case had any written communications from or to Postal Service officials concerning subjects raised in this complaint, whether or not the correspondence was in the form of a formal complaint? If not, please provide copies of the correspondence.
- b) You provide a general description of the type of forums in which various complainants have participated and where discussions of issues raised in this complaint may have been raised. You suggest that these forums are a matter of public record. Other than Commission proceedings, please provide a list of all forums in the last five years at which any of the complainants have raised the subjects of this complaint. For each, provide copies of any agendas, minutes, presentations, etc. or provide citations to such documents and provide the names of complainants and postal officials in attendance.
- c) Please provide a list of any private meetings any complainant may have had with postal officials in the last five years during which issues raised in this complaint were discussed – even if the issues were not raised as a formal complaint, but perhaps raised as a matter of rate design or product redesign. For each meeting, provide the date, people in attendance, the issues discussed relevant to this complaint, any agreements or understandings reached – including agreements to study issues or continue to discuss issues. If the meetings generated written documents relevant to the issues in this complaint, provide copies of the documents.

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APWU/TW et al.-T1-5

Please refer to your answer to APWU/TW et al.-T1-1. §3001.82 states that only complaints which raise an issue concerning whether or not rates or services contravene the policies of the Act shall be entertained in a complaint docket. Is it your testimony that current rates contravene the policies of the Act? Does your testimony fully describe all the ways in which the complainants believe the current rates contravene the policies of the Act? If, as the complainants' rate design witness, you are unable to fully speak to this issue please refer the question to the person(s) who can.