

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

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

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Docket No. C2004-1

FIRST SET OF INTERROGATORIES OF TIME WARNER INC. ET AL.  
TO NATIONAL NEWSPAPER ASSOCIATION WITNESS CREWS  
(TW ET AL./NNA-T2-1-7)  
(September 15, 2004)

Pursuant to sections 25, 26 and 27 of the rules of practice, 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 direct the following interrogatories to National Newspaper Association (NNA) witness Crews (NNA-T-2).

Time Warner Inc. et al. request that, in responding to these requests, NNA follow the guidelines set out in Time Warner Inc. et al.'s First Set of Interrogatories to NNA, filed July 27, 2004, which are incorporated by reference herein. If witness Crews is incapable of providing an answer to any question, it is requested that an answer be provided by another person capable of providing an answer.

Respectfully submitted,

s/ \_\_\_\_\_  
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**FIRST SET OF INTERROGATORIES  
FROM TIME WARNER INC. ET AL. TO WITNESS CREWS (NNA-T-2)**

TW et al./NNA-T2-1. You discuss in some detail various possible negative consequences for Cameron Citizen Observer.

- a. Did you try to estimate precisely how much the Citizen Observer's postage bill would change if the proposed rates were to take effect?
- b. Did you try to analyze ways that the Observer might adjust to a new set of rates by changing its mailing practices, for example by placing more mail pieces in each sack and thereby using fewer sacks?
- c. In the paragraph that begins at the bottom of page 7 you discuss the impact a sack charge might have on the Cameron Citizen Observer. In reaching your conclusions, did you consider the possibility that the added sack charge might be offset by reduced charges for pieces and pounds?
- d. At page 10 you discuss the possible impact on seven subscribers who reside in Zone 7 and suggest that their subscription rate might have to be raised by \$20 per year. Assume that the postage for mailing to those seven subscribers really were to increase by \$20 per year but at the same time the postage for mailing to subscribers who live locally were to decline, leaving the overall postage bill the same as before. Do you believe that the paper then would still raise the subscription rate for the seven subscribers in Zone 7? Please explain your answer.

TW et al./NNA-T2-2. Referring again to the seven subscribers who reside in Zone 7:

- a. How many, if any of the seven are “snowbirds,” and how many reside in Zone 7 permanently?
- b. You make the assumption (at p. 10, lines 6-7) that one ADC sack would contain the copies for all seven subscribers. Have you verified that they in fact live in the same ADC area? If they do not, over how many different service areas are the seven spread? If you don’t know, please provide the three-digit ZIP code area in which each of the seven resides.
- c. Assume that rather than being entered in an ADC sack the seven copies were entered in a Mixed ADC sack. Please confirm that the per-copy sack charge in that case would be about 22 cents per copy, rather than 46 cents.
- d. How many subscribers reside permanently in each of Zones 6, 5, 4 and 3?
- e. What would be the per-copy sack charge for out-of-state copies if all of them, including the seven to Zone 7, were to share the same Mixed ADC sack, or (if that would exceed the Postal Service’s maximum limit on sack weight) if they were placed in as few MADC sacks as possible? Please explain your answer.

TW et al./NNA-T2-3. You discuss at length the need for the Cameron Citizen Observer to hold on to the subscribers who become “snowbirds” during part of the year.

- a. In a typical year, how many in-county and how many outside county subscribers turn into snowbirds?

- b. For how many weeks on the average is a “snowbird” gone from home?
- c. What are the most common destinations for the “snowbird” subscribers to this newspaper? Are there clusters where several of them live in the same 5-digit ZIP code, or in the same 3-digit ZIP code? Please explain as fully as possible.

TW et al./NNA-T2-4. Please provide the following additional information about the Cameron Citizen Observer.

- a. What is the weight of a typical copy, and how much does it vary from issue to issue?
- b. Please describe the format of the paper. Is it a tabloid? What are the dimensions before the paper is folded? How many ways is it folded before it is mailed? Are copies wrapped in paper, polywrap or other protective material?
- c. What percent of the copies are pre-barcoded?
- d. Of the 384 outside county copies, how many go to the three other counties in the four-county area? How many are local to the Cameron post office?
- e. How many of the 384 outside county copies go outside the four counties but stay in the St. Joseph/Kansas City area?
- f. How many of the 384 outside county copies go outside the four counties but stay within postal Zones 1&2, i.e., within 150 miles of the originating office?

- g. What is the average percent editorial content? Please provide an estimate even if you do not know the precise number.

TW et al./NNA-T2-5. You indicate that the copies of the Observer that are not local to Cameron travel to St. Joseph in 5-digit, 3-digit, ADC and mixed ADC sacks.

- a. Consider a typical mailing in a season when most of the “snowbirds” are gone.
1. How many 5-digit sacks are sent to St. Joseph, and what is the average number of copies in those sacks? How many of those sacks travel outside the St. Joseph/Kansas City area?
  2. How many 3-digit sacks are sent to St. Joseph, what is the average number of copies per sack, and how many of those sacks travel outside the St. Joseph,/Kansas City area?
  3. How many ADC sacks are sent to St. Joseph, what is the average number of copies in those sacks, and how many of them are to outside the St. Joseph/Kansas City area?
  4. How many Mixed ADC sacks are sent to St. Joseph and what is the average number of copies in those sacks?
- b. Please answer the four questions in part a above for a typical mailing in a season when most of the “snowbirds” are home.

TW et al./NNA-T2-6 How many post offices at which mail could be entered are there in the four-county area served by the Citizen Observer? Please indicate the ZIP code for each such post office.

TW et al./NNA-T2-7 You describe a situation where the Atchison County Mail is entered in tubs rather than in sacks.

- a. Is the Atchison County Mail a weekly newspaper? If no, what is it?

- b. Please indicate the total mailed outside county circulation, average weight per copy, average percent editorial content and format (e.g., whether a tabloid, dimension when unfolded, number of times folded before mailed, etc.) for the Atchison County Mail.
- c. How many copies of the Atchison County Mail are mailed out of state: (1) during snowbird season; and (2) when most snowbirds are home?
- d. When Mr. Farmer enters his out-of state copies in tubs, does he presort the copies into different tubs according to where they are going (e.g., to a specified ADC) and label the tubs accordingly, or does he just put all the out-of-state copies in the same tub (or several tubs if they don't fit in one)? Does he put presorted bundles into the tubs or just individual copies?
- e. What is the sectional center facility (SCF) or processing plant to which the tubs with out-of-state mail are taken after Mr. Farmer has entered the tubs at the Rock Port post office?
- f. Is it your impression that the tub(s) with Mr. Farmer's out-of-state copies are emptied when they get to the SCF/processing center identified in part e above? If not, what, according to your understanding, is done with the tubs?