

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

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

Docket No. C2004-1

FOLLOW-UP INTERROGATORIES OF TIME WARNER INC. ET AL.
TO NATIONAL NEWSPAPER ASSOCIATION WITNESS CREWS
(TW ET AL./NNA-T2-8-10)
(October 6, 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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**FOLLOW-UP INTERROGATORIES OF TIME WARNER INC. ET AL.
TO NNA WITNESS CREWS**

TW et al./NNA-T2-8 Please refer to your response to TW et al./NNA-T2-5, in which you provide a detailed breakdown of the numbers of sacks with different presort levels and destinations that are used to mail the Cameron Citizen Observer.

- a. You indicate that there are nine mixed ADC sacks, with an average of nine pieces per sack. Please state whether you believe, and whether the editors of the Observer believe, that entering nine pieces each in nine mixed ADC sacks will cause faster delivery than entering 81 pieces in one mixed ADC sack. If you so believe, please state what the belief is based on.
- b. Would you agree that a mixed ADC sack, when examined only from the outside, could contain mail to anywhere in the US, and that one cannot determine where its contents might be going without opening the sack and examining them? Please explain any disagreement.
- c. If all mixed ADC sacks are dumped on a belt for further processing at the ADC/SCF to which the sacks are taken, does it then not follow that whether the 81 pieces are in one such sack or divided among nine sacks, they will be dumped on the same belt and handled the same way from there on? Please explain any disagreement.
- d. Please assume that the proposed rates were to go into effect, with a per-sack charge of \$1.53 for each mixed ADC sack. Do you believe it is likely that the Cameron Citizens Observer copies that currently are entered each week in nine different mixed ADC sacks, would soon be entered in only one mixed ADC sack? If no, please explain.

TW et al./NNA-T2-9 Please refer to your responses to TW et al./NNA-T2-5 and TW et al./NNA-T2-2.

- a. From the detailed breakdown that you provide of sack presort levels and destinations, it would appear that copies to the seven Zone 7 subscribers are among the copies that do get mailed in mixed ADC sacks. Please confirm that it is so. If not confirmed, please explain what types of sacks those copies are mailed in.
- b. In your response to TW et al./NNA-T2-2e you indicate, in response to a question about whether mail to the seven Zone 7 subscribers could be placed in a mixed ADC sack, that:

“experience would suggest the service would be so slow and unpredictable that the publisher would not likely be able to retain those subscribers. Most likely, then, the cost would be zero, as that mail would cease to exist.”

Given that it appears that these copies in fact already are entered in mixed ADC sacks, please explain whether your concern about adverse service consequences refers to the possibility that they might be entered along with many other copies in the same sack, and if not, what precisely it is that makes you conclude service would be any worse than it is today.

TW et al./NNA-T2-10 Please refer to your response to TW et al./NNA-T2-5.

- a. You indicate that two 3-digit sacks are sent to ZIP code area 640, one with 15 pieces and one with eight pieces. Please explain the rationale for using two sacks rather than one and describe any service benefits expected to result from this practice.

- b. You indicate that two 5-digit sacks are prepared for Cameron, one with three pieces and one with two pieces. Please explain the rationale for using two sacks rather than one and describe any service benefits expected to result from this practice.

- c. You indicate that two ADC sacks are sent to ADC 64240, one with 20 pieces and one with six pieces. Please explain the rationale for using two sacks rather than one and describe any service benefits expected to result from this practice.