

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 UNITED STATES POSTAL SERVICE WITNESS TANG
(TW ET AL./USPS-RT2-23-24)
(October 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 United States Postal Service witness Tang (USPS-RT-2).

If witness Tang is incapable of providing an answer to any question, it is requested that an answer be provided by the Postal Service as an institution or 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 WITNESS TANG (USPS-RT-2)**

TW et al./USPS-RT2-23 Please refer to your response to TW et al./USPS-RT2-15, particularly your reference to “child sacks” on BMC pallets.

- a. Does the Postal Service accept pallets with Periodicals sacks and BMC presort level? If yes, which DMM section describes such a presort level for Periodicals pallets? Are ASF pallets with Periodicals sacks also permitted?
- b. Among the publications you analyzed, did you in fact encounter examples of BMC pallets with Periodicals sacks? If yes, for what percentage of the publications analyzed did this occur?
- c. Did you assume per-pallet charges for “parent” pallets, in addition to the charges for the “child” sacks? If yes, what per-pallet charges did you assume for (1) mixed ADC pallets and (2) BMC pallets?

TW et al./USPS-RT2-24 Please refer to your response to TW et al./USPS-RT2-14, where you describe the criteria you used to determine mail piece machinability. Did you, in addition to the criteria mentioned, also consider the 20 ounce weight limit for Periodicals pieces, as specified in DMM section C820.2.4? If no, please explain why not.