

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 INTERROGATORY OF TIME WARNER INC. ET AL.
TO UNITED STATES POSTAL SERVICE WITNESS TANG
(TW ET AL./USPS-RT2-25)
(October 20, 2004)

Pursuant to section 26(a) 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 interrogatory to United States Postal Service witness Tang (USPS-RT-2).

If witness Tang is incapable of providing an answer, 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/ _____
John M. Burzio
Timothy L. Keegan

COUNSEL FOR
TIME WARNER INC.

Burzio & McLaughlin
Canal Square, Suite 540
1054 31st Street, N. W.
Washington, D. C. 20007-4403
Telephone: (202) 965-4555
Fax: (202) 965-4432
E-mail: burziomclaughlin@covad.net

**FOLLOW-UP INTERROGATORY
OF TIME WARNER INC. ET AL. TO WITNESS TANG (USPS-RT-2)**

TW et al./USPS-RT2-25 Please refer to USPS-LR-1 and the sampled publications labeled P1LM24, P1LM29, P1LM38 and P1LM54. While shown as having different circulation sizes and different frequencies on the “Summary” worksheet, all the numbers used to determine postage under both current and proposed rates are identical for the four publications, including all numbers of pieces, pounds, bundles, sacks and pallets at all presort levels, entry point categories, etc. Please check the underlying data and confirm whether or not these really are four different publications.