

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

TIME WARNER INC. ET AL. DESIGNATIONS  
OF WRITTEN CROSS-EXAMINATION TO USPS WITNESS TANG  
(October 21, 2004)

Pursuant to section 30(e)(2) of the rules of practice and Presiding Officer's Ruling No. C2004-1/10 (issued October 8, 2004), 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 designate the following as their written cross-examination of Postal Service witness Tang (USPS-RT-2):

TW et al./USPS-RT2-1-4 and 6-12 to witness Tang, responses filed September 28, 2004;

TW et al./USPS-RT2-13-20 to witness Tang, responses filed October 12, 2004;

TW et al./USPS-RT2-21-22 to witness Tang, responses filed October 14, 2004;

TW et al./USPS-RT2-23-24 to witness Tang, responses filed October 15, 2004;

MPA/USPS-RT2-1-7 to witness Tang, responses filed October 14, 2004;

Response of witness Tang to POIR No. 2, filed October 15, 2004;

File "C2004-1 LR-1.zip" from "USPS-LR-1/C2004-1: Publication-Specific Material in Response to TW et al./USPS-RT2-13," filed October 15, 2004.<sup>1</sup>

Two hard copies of the designated materials are today being deposited with the Secretary of the Commission, except for file C2004-1 LR-1.zip from USPS-LR-1/C2004-1, which is subject to protective conditions pursuant to POR No. C2004-1/11 (issued October 14, 2004).

Respectfully submitted,

s/ \_\_\_\_\_  
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<sup>1</sup> USPS-LR1/C2004-1 contains two categories of materials, which are segregated in separate files: (1) "a copy requested by the complainants of a database of publication-specific information used by Postal Service witness Tang for purposes of evaluating what the impact of the Periodicals rate schedule advanced by complainants in this case might be on a sample set of Periodicals"; and (2) "the full regression inputs and outputs" from a regression analysis performed by witness Tang in response to POIR No. 2.

This designation relates to the first category only, which is contained in file "C2004-1 LR-1 zip" and which the Postal Service characterizes as Rule 31(b)(2) Category 4 material ("Material Provided in Response to Discovery"). It does not relate to the second category, which is contained in two separate files ("POIR Item 1-2 Regression Workbook.xls" and "POIR Item 3 Regression Workbook.xls") and which the Postal Service characterizes as--at least in some part-- Category 5 material ("Disassociated Material"). See "Notice of the United States Postal Service of Filing of Library Reference USPS-LR-1/C2004-1" (filed October 15, 2004).