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

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POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

INTERROGATORY OF TIME WARNER INC.
TO THE UNITED STATES POSTAL SERVICE (TW/USPS-1)
(February 7, 2000)

Pursuant to sections 25 and 26 of the Rules of Practice, Time Warner Inc. (Time Warner) directs the following interrogatory to the United States Postal Service.

Respectfully submitted,

/ John M. Burzio ⊅imothy L. Keegan

Counsel for Time Warner Inc.

Burzio & McLaughlin Canal Square, Suite 540 1054 31st Street, N. W. Washington, D. C. 20007-4403 tel/(202) 965-4555 fax/(202) 965-4432 <u>TW/USPS-1</u> Please refer to Table I-2B, which provides FY98 manhours per MODS code, organized per LDC.

- a. Please confirm that MODS also provides measures of mail volumes, as pieces handled (TPH) and pieces fed (TPF) at the MODS operations under LDC 11, 12, 13 and 14. If not fully confirmed, please specify which volume measures are produced in MODS for each of the MODS codes listed under those LDC codes.
- b. Please provide the available measures of FY98 MODS volumes for each MODS code under LDC's 11, 12, 13 and 14. Please provide the results in spreadsheet form, if possible.
- c. Please provide MODS FY99 measures of mail volumes and manhours for each MODS code under LDC's 11, 12, 13 and 14.
- d. Are MODS data for mail volumes and manhours for the operations referred to above available for any portion of FY2000? If yes, provide that information for the accounting periods for which it is available. If not, when is such information likely to be available?

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with sections 12, 25(a), and 26(a) of the Rules of Practice.

Timothy L. Keegan

February 7, 2000