

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

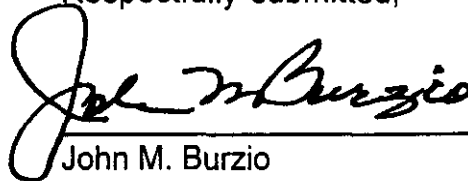
POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

INTERROGATORIES OF TIME WARNER INC.
TO WITNESS VAN-TY-SMITH (TW/USPS-T17-1-4)
(February 7, 2000)

Pursuant to sections 25 and 26 of the Rules of Practice, Time Warner Inc. (Time Warner) directs the following interrogatories to United States Postal Service witness Van-Ty-Smith (USPS-T-17). If witness Van-Ty-Smith is unable to respond to any interrogatory, we request that a response be provided by an appropriate person capable of providing an answer.

Respectfully submitted,



John M. Burzio
Timothy L. Keegan

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Time Warner Inc.

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TW/USPS-T17-1 Please provide electronic spreadsheet (e.g., Excel) formats for all the tables presented in LR-I-106. If an electronic spreadsheet format has already been provided for some or all of these tables, please identify all relevant files.

TW/USPS-T17-2 Please refer to the breakdown of Non-MODS clerk/mailhandler costs in Tables I-4A and I-4B in LR-I-106.

- a. Please confirm that this breakdown was produced using IOCS tally information. If not confirmed, please identify all data and explain how they were used.
- b. Please name the SAS program(s) which produced the above mentioned tables and explain exactly where and under what file name(s) it (they) can be found.
- c. Please name the IOCS file used to produce these tables and explain under what file name and in what library reference it can be found.
- d. Besides uniform operation codes, please explain precisely what IOCS data items were used to associate each non-MODS mail processing tally with individual pools. Please identify the fields of IOCS tally records that were used, the specific IOCS questions that those fields contain the answer to, and the logic applied to select the pool for each tally.
- e. Precisely what characteristics of an IOCS tally causes it to be included in the MANF pool? What causes it to be included in the allied pool?
- f. For each mail processing Non-MODS cost pool specified in Tables I-4A and I-4B, please provide a further breakdown by mail processing uniform operation code.

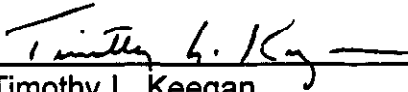
TW/USPS-T17-3 Please provide a breakdown of FY96 non-MODS costs similar to that shown in Tables I-4A and I-4B, using FY96 IOCS data.

TW/USPS-T17-4

- a. Please apply the logic used to create Tables I-4A and I-4B in LR-106 to the IOCS clerk and mailhandler tallies assigned to each of the following MODS cost pools: LD41, LD43, LD44, LD48, LD49 and LD79. Present results in the same manner as is used in tables I-4A and I-4B.
- b. Is it fair to conclude that most allied labor performed in Function 4 offices is recorded under LD43?

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