

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

UNITED STATES POSTAL SERVICE
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO
TIME WARNER, INC. WITNESS O'BRIEN
(USPS/TW-T2-1-3)

Pursuant to rules 25 and 26 of the Rules of Practice and procedure, the United States Postal Service directs the following interrogatories and requests for production of documents to Time Warner, Inc. witness O'Brien: USPS/TW-T2-1-3.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Susan M. Duchek

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June 2, 2000

USPS/TW-T2-1. The cover sheet of your testimony indicates you are testifying on behalf of

Alliance of Non Profit Mailers
American Business Media
Coalitions of Religious Press Associations
Dow Jones & Company, Inc.
Magazine Publishers of America, Inc.
The McGraw-Hill Companies, Inc.
National Newspaper Association
and
Time Warner, Inc.

On page 16, lines 10-11, of your testimony you that "The Task Force also recommended a reduction in redundant "hot" service trips, which Time Inc. supports, because we do not expect hot service trips for our magazines." Does your statement only reflect the views of Time, Inc., as it indicates? What, if anything, can you say regarding the views of the other organizations for which you are testifying?

USPS/TW-T2-2. On page 16 of your testimony, lines 18-20, you say that: "Most of these annexes do not have direct transportation to the delivery units. So any product that is processed in an annex must be handled at least twice more than it would if it had continued to be processed at the P&DC."

- a) What is the basis for your conclusion that most of these annexes do not have direct transportation to the delivery units? Please cite all studies or other data you have reviewed. If your conclusion is based on your own observation please list the annexes you have studied and your understanding of their transportation links.

- b) Your statement, that any product processed in an annex must be handled at least twice more than it would if it had continued to be processed at the P&DC, seems to imply some additional mail handler time (cost) associated with the annex. Is this inference correct? If so, please explain how you measured the mail handler time it would take to transport the product within the possibly multi-storied plant, accounting for its destination operation and the operation's location within the plant, and concluded that it was less than the cost of loading and unloading the product to get it to and from the annex. If your understanding is based on studies and/or data please provide them.

USPS/TW-T2-3. On page 16, lines 21-22, you say that "The Task Force observed periodicals being shipped back and forth between the P&DC's and annexes and wondered why periodicals should be responsible for this additional expense."

- a) Please indicate the types of operations the Task Force observed in each of the annexes it visited. Please include the type of equipment that was deployed in each annex and the types of mail being worked on each piece of equipment.
- b) For each P&DC-annex combination visited please indicate the Task Force's observation of empty space in the P&DC that could have been used to deploy the equipment that was observed in the annex.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

A handwritten signature in cursive script, appearing to read "Susan M. Duchek", is written over a horizontal line.

Susan M. Duchek

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