

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

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POSTAL RATE COMMISSION  
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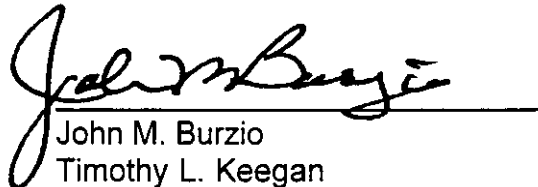
POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

INTERROGATORIES OF TIME WARNER INC.  
TO UNITED STATES POSTAL SERVICE WITNESS  
PATELUNAS (TW/USPS-ST44-1-3)  
(July 14, 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 Patelunas (USPS-ST-44). If witness Patelunas 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,



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Timothy L. Keegan

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**INTERROGATORIES OF TIME WARNER INC. TO WITNESS  
PATELUNAS (USPS-ST-44)**

TW/USPS-ST44-1 Please confirm that the calculations performed by yourself and witness Kay (USPS-ST-45) depend on first having determined BY99 volume variable costs per subclass and special service for each cost segment. If not confirmed, please explain.

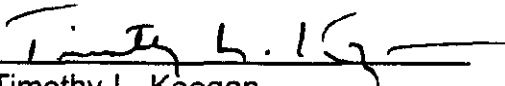
TW/USPS-ST44-2 Please confirm that development of BY99 volume variable costs per subclass and special service category in cost segments 3 and 6 depends on the use of IOCS data, similar to the FY98 IOCS data contained in USPS LR-I-12. If not confirmed, please explain how the BY99 cost data were derived.

TW/USPS-ST44-3 Have the IOCS data needed to replicate BY99 cost data for cost segments 3 and 6 been included with the data provided in connection with your and witness Kay's supplemental testimony? If so, please describe where they can be found. If not, please provide them in a format similar to that used in LR-I-12. In either case, please answer the following:

- a. Was the attribution and distribution of BY99 mail processing costs to subclasses and special services performed using the same SAS program used by witness Van-Ty-Smith to distribute the FY98 costs? If not, please explain all differences and provide the program that will replicate the Postal Service's BY99 costs.
- b. Please provide the Postal Service's estimates of BY99 volume variable mail processing costs per MODS, NonMODS and BMC cost pool and per subclass and special service. If this information already has been filed, please explain where it can be found.
- c. Please provide all other information pertinent to the development of BY99 cost data that correspond to the FY98 information provided in USPS LR-I-106.
- d. Please identify and provide all other information necessary to replicate the Postal Service's attribution and distribution of BY99 cost data, including all raw data used, in all cost segments, that has not been provided already in this case.

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

July 14, 2000