

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

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POSTAL RATE AND FEE CHANGES

Docket No. R2001-1

INTERROGATORIES OF AOL TIME WARNER INC.  
TO WITNESS VAN-TY-SMITH (AOL-TW/USPS-T13-1-3)  
(October 2, 2001)

Pursuant to sections 25 and 26 of the Rules of Practice, AOL Time Warner Inc. (AOL Time Warner) directs the following interrogatories to United States Postal Service witness Van-Ty-Smith (USPS-T-13). 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,

  
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## **FIRST SET OF INTERROGATORIES TO WITNESS VAN-TY-SMITH (USPS-T-13)**

AOL-TW/USPS-T13-1      You refer to USPS LR-J-55 as fulfilling the same role as USPS LR-I-106 did in R2000-1. You also state that the purpose of your testimony is to summarize USPS LR-J-55. USPS-T-13, at 1. Yet LR-J-55, both the hard copy and the electronic version posted on the Commission's web site, contains only a few listings of SAS code. On the other hand, USPS LR-J-82, the "PRC Version" of LR-J-55, contains much more information, including eight EXCEL files with various tables and an apparently more complete list of SAS code files.

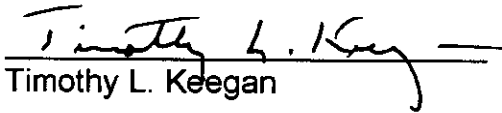
- a.      Please describe the contents of each of the Excel files in LR-J-82.
- b.      Please indicate which, if any, of the EXCEL files in LR-J-82 also apply to EXCEL-J-55.
- c.      Please provide LR-J-55 equivalents of each EXCEL file in LR-J-82.
- d.      Please provide, in electronic spreadsheet and hard copy form, the equivalent information for this rate case of each of the tables in LR-I-106, to the extent they are not provided in response to parts b or c of this interrogatory.
- e.      Does the narrative provided in LR-I-106 apply without any change to LR-J-55? If not, please provide an updated narrative that includes all changes in program logic, cost pool definition, etc. between the last rate case and this one.

AOL-TW/USPS-T13-2      Please provide electronic spreadsheet (e.g., Excel) formats for the tables shown at the end of your testimony. If an electronic spreadsheet format already has been provided for some or all of these tables, please provide all relevant references.

AOL-TW/USPS-T13-3      Apart from the different assumptions about volume variability at various cost pools, precisely what are the methodological differences between the programs described in LR-J-55 and LR-J-82? In particular, does your "PRC version" incorporate the Commission's preferred R97-1 and R2000-1 method for distribution of allied mixed mail costs?

# 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

October 2, 2001