

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

Docket No. R2001-1

INTERROGATORIES OF AOL TIME WARNER INC.
TO WITNESS VAN-TY-SMITH (AOL-TW/USPS-T13-7-8)
(October 31, 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,



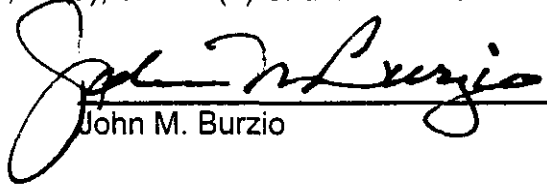
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CERTIFICATE OF SERVICE

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.


John M. Burzio

October 31, 2001

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

AOL-TW/USPS-T13-7 Please refer to your response to interrogatory TW/USPS-T17-18 in Docket No. R2000-1, Tr. 15/6621-24, and to your distribution in this docket of mail processing costs in Non-MODS facilities.

a. Please confirm that the methodology you propose for distributing Non-MODS costs in this case is identical to the one you proposed in R2000-1. If not confirmed, please explain all differences.

b. Please confirm that except for tallies with activity code 6521, representing break-time, you assign all other mail processing Non-MODS tallies to cost pools based on the Question 18 and Question 19 answers stored in fields F128, F9211, F116, F118 and F121 of the IOCS data, plus the uniform operation codes stored in F260. If not confirmed, please explain in detail.

c. Please confirm that, as in R2000-1, you assign all break-time tallies to a separate cost pool, named "Z BREAKS", and that you do not use any of the recorded Question 18 or Question 19 data, or operation code data, to distribute the break-time costs. If not confirmed, please explain fully.

d. In Docket R2000-1 you prepared, in response to TW/USPS-T17-18, an alternative distribution of Non-MODS costs that assigned break-time tallies to cost pools in the same way that it assigns all other tallies. Please perform a similar alternative distribution of Non-MODS costs to subclasses and special services, using the BY2000 IOCS data. Please present the results in a manner similar to that you used in R2000-1.

AOL-TW/USPS-T13-8 Please refer to the field named F114 in the IOCS dataset.

a. Please confirm that for the MODS mail processing tallies, F114 contains the 3-digit MODS number based on which you assign tallies to cost pools.

b. Please confirm that the majority of Non-MODS and BMC mail processing tallies also contain 3-digit codes in F114.

c. Are the 3-digit codes found in F114 on most Non-MODS and BMC tallies recorded by the IOCS clerks? If no, how were they generated? If yes, based on what instructions were these numbers recorded?

d. Please explain the meaning of each 3-digit number found in field F114 of Non-MODS tallies. Please also provide any written documentation explaining the meaning of these numbers.

e. Please explain the meaning of each 3-digit number found in field F114 of BMC tallies. Please also provide any written documentation explaining the meaning of these numbers.