

Before The
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

Complaint of Time Warner Inc. et al.)
Concerning Periodicals Rates)

Docket No. C2004-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO TIME WARNER, INC. ET AL.
WITNESS ROBERT W. MITCHELL (OCA/TW-T1-1-6)
June 14, 2004

Pursuant to Rules 25 through 28 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA interrogatories OCA/TW-T4-1 and -2, dated June 14, 2003, are hereby incorporated by reference.

Respectfully submitted,

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OCA/TW-T1-1. As a general proposition, all other things being equal, is it correct that if a particular amount of Periodicals volume takes advantage of the proposed rate revisions and discounts, and a smaller amount of Periodicals volume does not take advantage of the proposed rate revisions and discounts, then, on average, the Periodical pieces not taking such advantages will necessarily see unit rate changes larger than the unit rate changes for those Periodicals taking advantage of the proposed rate revisions and discounts? Please explain any “no” answer.

OCA/TW-T1-2. Please give your estimate of the Periodicals volume that will take advantage of proposed discounts.

OCA/TW-T1-3. Please give your estimate of the Periodicals volume that will not take advantage of proposed discounts.

OCA/TW-T1-4. Is it plausible that the price signals given to allegedly “less efficiently” prepared Periodicals mail might drive some of this volume out of the postal system altogether, perhaps even causing some publications to go out of business? Please explain any “no” answer.

OCA/TW-T1-5. Generally speaking, will provision of “efficient” pricing signals, such as those proposed, tend to give higher volume publications that prepare their mail “efficiently” a competitive edge over publications that cannot or do not prepare their mail “efficiently?” Please explain any “no” answer.

OCA/TW-T1-6. Please give a ballpark estimate of the pool of revenues that will be de-averaged based upon the TW et al proposal, i.e., the sum of rate reductions for mailers

that can utilize the proposed rate revisions and discounts as compared to the sum of rate increases for mailers that do not utilize the rate revisions and discounts.

Respectfully submitted,

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