

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

COMPLAINT OF TIME WARNER INC. ET AL.
CONCERNING PERIODICALS RATES

Docket No. C2004-1

RESPONSES OF TIME WARNER INC. ET AL.
WITNESS ROBERT W. MITCHELL TO APWU/TW ET AL.-T1-4-5
(July 9, 2004)

Time Warner Inc., Condé Nast Publications, a Division of Advance Magazine Publishers Inc., Newsweek, Inc., The Reader's Digest Association, Inc., and TV Guide Magazine Group, Inc. (collectively, Time Warner Inc. et al.) hereby provide the responses of witness Mitchell (TW et al.-T1) to American Postal Workers Union follow-up interrogatories APWU/TW et al.-T1-4-5, filed July 2, 2004.

Each interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

s/
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Response of Witness Mitchell (TW et al.-T-1) to APWU/TW et al.-T1-4

APWU/TW et al.-T1-4. To the extent that you cannot answer any part of this inquiry, please refer it to someone who can. Please refer to your response to APWU/TW et al.-T1-2.

- a). Can we assume that none of the complainants in this case had any written communications from or to Postal Service officials concerning subjects raised in this complaint, whether or not the correspondence was in the form of a formal complaint? If not, please provide copies of the correspondence. ` t) You provide a
- b) You provide a general description of the type of forums in which various complainants have participated and where discussions of issues raised in this complaint may have been raised. You suggest that these forums are a matter of public record. Other than Commission proceedings, please provide a list of all forums in the last five years at which any of the complainants have raised the subjects of this complaint. For each, provide copies of any agendas, minutes, presentations, etc. or provide citations to such documents and provide the names of complainants and postal officials in attendance. ` d) Please provide a list of any
- c) Please provide a list of any private meetings any complainant may have had with postal officials in the last five years during which issues raised in this complaint were discussed – even if the issues were not raised as a formal complaint, but perhaps raised as a matter of rate design or product redesign. For each meeting, provide the date, people in attendance, the issues discussed relevant to this complaint, any agreements or understandings reached – including agreements to study issues or continue to discuss issues. If the meetings generated written documents relevant to the issues in this complaint, provide copies of the documents.

RESPONSE

- a) As stated in my response to APWU/TW et al.-T1-2, filed June 28, 2004, I am unaware of "any written communications between the complainants and the Postal Service that relate to the subject matter of the complaint." This question has also been referred to Time Warner Inc. et al.
- b) As indicated in my response to APWU/TW et al.-T1-2, I do not possess the requested information. This question has also been referred to Time Warner Inc. et al.
- c) I am not aware of any such meetings. This question has also been referred to Time Warner Inc. et al.

Response of Witness Mitchell (TW et al.-T-1) to APWU/TW et al.-T1-5

APWU/TW et al.-T1-5. Please refer to your answer to APWU/TW et al.-T1-1. §3001.82 states that only complaints which raise an issue concerning whether or not rates or services contravene the policies of the Act shall be entertained in a complaint docket. Is it your testimony that current rates contravene the policies of the Act? Does your testimony fully describe all the ways in which the complainants believe the current rates contravene the policies of the Act? If, as the complainants' rate design witness, you are unable to fully speak to this issue please refer the question to the person(s) who can.

RESPONSE

Yes. No. This question has also been referred to Time Warner Inc. et al.