

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

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

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Docket No. C2004-1

SECOND SET OF INTERROGATORIES OF TIME WARNER INC. ET AL.  
TO THE UNITED STATES POSTAL SERVICE (TW ET AL./USPS-2)  
(September 28, 2004)

Pursuant to sections 25, 26 and 27 of the rules of practice, 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 direct the following interrogatory to the United States Postal Service (USPS).

Respectfully submitted,

s/ \_\_\_\_\_  
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**SECOND SET OF INTERROGATORIES  
FROM TIME WARNER INC. ET AL. TO USPS**

TW et al./USPS-2 Witnesses Crews (NNA-T-2) and Heath (NNA-T-1) have described instances in which newspapers that mail a few pieces to distant (out of state) locations are allowed, by local arrangement, to enter these pieces without the use of sacks. Crews reports the case of the Atchison County Mail, which is allowed to enter its small number of out-of-state copies in tubs. He indicates that since this practice started there have been many fewer complaints about slow service.

Heath describes experiments where “newspapers may place small bundles or even unbundled loose newspapers prepared in proper sortation” in plastic tubs, and states that the tubs “go right to FSM1000 flat-sorting machines.” He also refers to instances where bundles of newspapers are placed in APC’s or hampers at the DDU loading dock, from where the APC’s or hampers then are taken upstream to an SCF/ADC.

Please provide comments on these arrangements by a knowledgeable official. In particular, please address the following.

- a. Is the Postal Service aware that arrangements of the type described above are made for newspapers entered in some locations?
- b. How widespread are these practices today?
- c. When newspapers destined to distant locations are placed in tubs in the manner described by Crews and Heath, will the tubs, when they arrive at the processing plant, be taken to a bundle sorting operation where any bundles with ADC or finer presort can be separated and sent to their proper destination? Or will the entire contents of the tubs be “prepped” directly for outgoing primary flats sortation? Will pieces and bundles of newspapers

- entered in this manner typically be intermingled with First Class flats, or will they be kept separate as Periodicals? Please explain and indicate the degree to which practices differ in different locations.
- d. When newspaper bundles to distant locations are entered at the DU and placed in APC's or hampers which then are taken to the processing plant, as described by Heath, what is the sequence of operations that will be performed on this mail at the plant? Will bundles be sorted and those with presort to an ADC or finer sent to their proper destination? Or will all pieces be prepped for outgoing primary flats sortation? Will pieces and bundles entered in this manner typically be intermingled with First Class flats, or will they be kept separate as Periodicals? Please explain and indicate the degree to which practices differ in different locations.
- e. What is the Postal Service's view of the service consequences of the types of arrangements described above? If, as comments by Crews and Heath appear to indicate, service complaints become less frequent when such practices are established, please discuss all reasons why it may be so. Please include in your response a comparison of the different transportation and processing steps performed when flats to distant locations are entered at a DU in low-volume "skin sacks" and when they are entered in tubs or rolling containers.
- f. What is the Postal Service's view of the cost consequences of the types of arrangements described above? Please include in your response a comparison of the different transportation and processing steps performed when flats to distant locations are entered at a DU in low-volume "skin sacks" and when they are entered in tubs or rolling containers.