

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

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

Docket No. C2004-1

RESPONSE OF UNITED STATES POSTAL SERVICE  
WITNESS RACHEL TANG TO INTERROGATORIES OF  
TIME WARNER INC. ET AL. (TW ET AL./USPS-RT2-25)

The United States Postal Service hereby files the response of witness Rachel Tang to the following interrogatories of Time Warner Inc. et al.:

TW ET AL./USPS-RT2-25, filed on October 20, 2004.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

/s/  
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David H. Rubin  
Attorney

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2986; Fax -6187  
October 22, 2004

RESPONSE OF UNITED STATES POSTAL SERVICE  
WITNESS RACHEL TANG TO INTERROGATORY OF TIME WARNER ET AL.

**TW et al./USPS-RT2-25** Please refer to USPS-LR-1 and the sampled publications labeled P1LM24, P1LM29, P1LM38 and P1LM54. While shown as having different circulation sizes and different frequencies on the “Summary” worksheet, all the numbers used to determine postage under both current and proposed rates are identical for the four publications, including all numbers of pieces, pounds, bundles, sacks and pallets at all presort levels, entry point categories, etc. Please check the underlying data and confirm whether or not these really are four different publications.

**RESPONSE:**

According to the information in the mail.dat file, the four sampled publications labeled P1LM24, P1LM29, P1LM38 and P1LM54 are four different publications in the same mailing, either co-mailed or co-palletized.

The 251 observations in USPS-LR-1 were randomly drawn to evenly populate the six size/density groups. For the large and medium size groups, publications were drawn from those publications that had provided mail.dat files to PostalOne!. For the group of medium issue size and low density publications, to which the four publications in question belong, 50 samples were randomly drawn from a collection of only 60 medium size, low density publications in the PostalOne! system. Thus there was a high probability that these four co-mingled publications would be selected.

It is extremely difficult to extract individual publication data, or calculate postage under the Time Warner et al. proposal, for each of these co-mingled publications. Suppose in a mailing there is a SCF pallet with 2000 pieces – 500 for publication A, 600 for publication B, 300 for publication C and 600 for publication D. Under the proposed rate structure, it is not clear how to allocate the container or bundle charge to each publication. Therefore, the same mailing characteristics were applied to each of the four different publications.