

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

Postal Rate and Fee Changes, 2005 : Docket No. R2005-1
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FOLLOW-UP INTERROGATORY OF TIME WARNER INC.
TO UNITED STATES POSTAL SERVICE WITNESS BOZZO
(TW/USPS-T12-1)
(June 17, 2005)

Pursuant to sections 25, 26 and 27 of the rules of practice, Time Warner Inc. directs the following interrogatory to United States Postal Service witness Bozzo (USPS-T-12).

If witness Bozzo is incapable of providing an answer to any question, it is requested that an answer be provided by the Postal Service as an institution or by another person capable of providing an answer.

Respectfully submitted,

s/ _____
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FOLLOW-UP INTERROGATORY TO WITNESS BOZZO (USPS-T-12)

TW/USPS-T12-1 Please refer to your response to TW/USPS-T11-11, redirected from witness Van-Ty-Smith. The table provided with that answer includes measures of TPH (total piece handlings) for MODS numbers where in the past MODS provided only estimates of workhours. In some cases it is not immediately obvious what units of measure are used to represent volume. Please explain the units of measure used for volume, as well as the method by which the volume measures are obtained (e.g., by weighing, machine counts, etc.) for each specified MODS number in each of the following cost pools:

- (1) 1POUCHNG (MODS 120-123 and 345)
- (2) 1DSPATCH (MODS 124-129);
- (3) 1OPTRANS (MODS 114);
- (4) 1OPBULK (MODS 115-117 and 185-186);
- (5) 1OPREF (MODS 110-112, 180, 181, 328, 329, 343, 344);
- (6) REWRAP (MODS 109); and
- (7) 1SUPPORT (MODS 798 – miscoded/uncoded mail).