

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

Postal Rate and Fee Changes

Docket No. R2006-1

THIRD SET OF INTERROGATORIES OF TIME WARNER INC.
TO UNITED STATES POSTAL SERVICE WITNESS LOETSCHER
(TW/USPS-T28-17)
(June 14, 2006)

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 Loetscher (USPS-T-28).

If witness Loetscher is incapable of providing an answer, 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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THIRD SET OF INTERROGATORIES TO WITNESS LOETSCHER (USPS-T-28)

TW/USPS-T28-17 Please refer to your answers to TW/USPS-T28-1 regarding the similarities and differences between the study you presented in LR-K-91 in Docket No. R2005-1 and the corresponding study presented in LR-L-91 in the present docket. Please refer also to Tables 3 and 4 in LR-K-91 entitled respectively “FY 2004 Periodicals Outside County Distribution of Sacks by Presort Level and Number of Pieces” and “Periodicals Outside County Pieces in Under 24 Piece Sacks By Modeled Presort Rate.”

- a. Please confirm that it is possible, based on the information you collected for the LR-L-91 study, to produce tables similar to Tables 3 and 4 in LR-K-91. If not confirmed, please explain.
- b. Please produce tables similar to Tables 3 and 4 in LR-K-91, in spreadsheet form, using the most current data.
- c. Please confirm that the type of information referred to in parts a and b above is needed to derive the conclusions you present in Table 5 of LR-L-91, regarding the number of Periodicals sacks (in FY2005) that had less than 24 pieces in them, and the average number of pieces in different types of sacks.
- d. Please explain how you did derive the estimates in Table 5 of LR-L-91 and provide any data necessary to replicate the derivation of those estimates that have not already been filed in your testimony or in response to other interrogatories.