

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

Postal Rate and Fee Changes

Docket No. R2006-1

FIRST SET OF INTERROGATORIES OF TIME WARNER INC.
TO UNITED STATES POSTAL SERVICE WITNESS BOZZO
(TW/USPS-T12-1-2)
(June 19, 2006)

Pursuant to sections 25, 26 and 27 of the rules of practice, Time Warner Inc. directs the following interrogatories 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/ _____
John M. Burzio
Timothy L. Keegan

COUNSEL FOR
TIME WARNER INC.

Burzio & McLaughlin
Canal Square, Suite 540
1054 31st Street, N. W.
Washington, D. C. 20007-4403
Telephone: (202) 965-4555
Fax: (202) 965-4432
E-mail: burziomclaughlin@covad.net

FIRST SET OF INTERROGATORIES TO WITNESS BOZZO (USPS-T-12)

TW/USPS-T12-1 Please refer to the tables provided as attachments to your response to TW/USPS-T11-1bc.

- a. Please identify the MODS operations where volumes shown represent something other than counts of individual mail pieces (e.g., if they refer to counts of sacks or trays rather than of the pieces that are in the sacks or trays). Please state in each case what the volume measures mean.
- b. For each MODS operation identified in part a above, please describe how the volume measures shown in your tables are obtained.

TW/USPS-T12-2 Please describe the various ways (e.g. weighing, measuring of lineal feet, etc.) in which estimates of first handling pieces (FHP) to flats sorting operations are measured in today's post offices. Please describe also the approximate frequency of each method, and the factors used to convert measures taken into estimates of numbers of flats. Please state also whether different conversion factors are used for different categories of flats (e.g., magazines, newspapers, sealed envelopes, etc.)