

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, DC 20268-0001

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Postal Rate and Fee Changes

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Docket No. R2006-1

SECOND SET OF INTERROGATORIES OF TIME WARNER INC.  
TO THE UNITED STATES POSTAL SERVICE AS AN INSTITUTION  
(TW/USPS-3-4)  
(June 28, 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 as an institution.

Respectfully submitted,

s/ \_\_\_\_\_  
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## **SECOND SET OF INTERROGATORIES TO UNITED STATES POSTAL SERVICE**

TW/USPS-3 This and the following interrogatory seek further clarification regarding the Postal Service's answer to MPA/USPS-T25-2b, redirected from witness Mayes to the Postal Service. Along with that answer the Postal Service provided a pdf display of a spreadsheet that estimates the "average number of facilities a non-dropshipped sack/pallet of Outside County Periodicals goes through."

Two sources are referred to in the above mentioned response:

1. table 13 of the response to TW/USPS-T28-7; and
2. estimates developed from a web-based survey of the number of facilities through which sacks and pallets at various presort levels and types of entry points pass.

Tables presenting the results, for sacks and pallets, of the web-based survey are presented at the top of the spreadsheet referred to above. The following questions concern the contents of those tables.

- a. Please confirm that if a container is entered by the mailer at facility A and opened at the same facility, then you count the "number of facilities passed through" as zero, whereas if the container is entered at A, transported directly to B and opened at B, then you count the "number of facilities passed through" as one.
- b. When the entry point is OSCF (originating SCF) do your estimates include the possibility that a container may be entered at the OAO (originating associate office, station or branch), then transported to the OSCF from which it is sent further? Or do you simply assume that OSCF containers start at the OSCF after being brought there by the mailers?
- c. The table for pallets refers to OBMC (originating BMC) as an entry point, while the table for sacks refers to OTH (originating transfer hub). Please confirm that you in fact are using the terms OBMC and OTH (as well as the terms DBMC and DTH) interchangeably. If not, what is the difference?
- d. The "average number of facilities passed through" appears fairly similar for sacks and pallets with corresponding presort levels when the entry point is either OSCF or OADC. But when the entry point is

OBMC/OTH, they are shown in your tables as being very different. For example, your table indicates that a 3-digit sack entered at an OTH goes through an average of 2.895 facilities, but a 3-digit pallet entered at an OBMC goes through an average of only 1.155 facilities. Please shed any light possible on this counter-intuitive result and, if necessary, provide corrected values.

- e. Your sack table indicates that MADC sacks entered at the OADC pass through zero facilities, i.e., they are also opened at the OADC. Please confirm that this reflects the standard operating procedures for Periodicals that were in effect until recently, namely that MADC sacks would be opened at the originating ADC. If not confirmed, please explain.

TW/USPS-4 Please refer, as in the preceding interrogatory, to the Postal Service's response to MPA/USPS-T25-2b.

- a. Please confirm that, under the operating procedures being established under the Periodicals cost reduction initiative, Periodicals MADC sacks will not be opened at the OADC, unless they are marked as containing only flats destined to facilities where First Class mail travels by surface, or the OADC happens to be a L009 facility.
- b. Consider a Periodicals MADC sack that is entered at an OSCF which is not an ADC, and that is marked as containing only flats to facilities where First Class mail travels by surface. Will such a sack, under the new operating procedures, be opened at the OSCF, or will it, as in the past, be sent to the OADC?
- c. Does the Postal Service expect that there will be direct ground transportation from each OSCF to its corresponding outgoing L009 facility, so that Periodicals whose outgoing processing is being consolidated at the L009 facilities can be brought there directly without any transshipment?
- d. Approximately what percent of outgoing Periodicals volume is expected to be entered at the L009 facilities?