

DOCKET SECTION

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

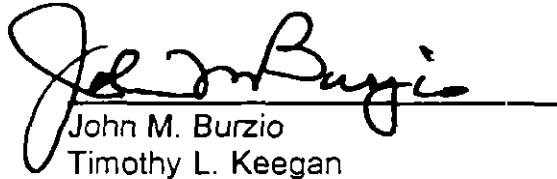
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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY
Docket No. R97-1

POSTAL RATE & FEE CHANGES, 1997

FOLLOW-UP INTERROGATORIES OF TIME WARNER INC.
TO UNITED STATES POSTAL SERVICE WITNESS DEGEN: TW/USPS-T12-42-43
(October 7, 1997)

Pursuant to sections 25 and 26 of the Rules of Practice and Special Rule 2(D), Time Warner Inc. (Time Warner) directs the following interrogatories to United States Postal Service witness Degen (USPS-T-12). If witness Degen is unable to respond, we request that a response be provided by an appropriate person capable of providing an answer.

Respectfully submitted,


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Timothy L. Keegan

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served the instant document on all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.


Timothy L. Keegan

October 7, 1997

NINTH SET OF INTERROGATORIES TO WITNESS DEGEN (USPS-T-14)

TW/USPS-T12-42. Please refer to your response to OCA/USPS-T12-60(a) (filed September 25, 1997), where you state: "Assuming that the MODS operation group productivities do not vary much by subclass, then the distribution keys' proportions of cost can be interpreted as proportions of handlings."

a. Please describe the arguments and/or evidence that justifies an assumption that the MODS operation group productivities do not vary much by subclass.

b. Please describe the arguments and/or evidence that you considered, in the process of deciding that this assumption is justified, that weighed against making it.

TW/USPS-T12-43. Please refer to DMA/USPS-T12-10(a) (response filed September 30, 1997), which quoted you as stating, "I believe that the MODS activity at the operation group level and the employee's activity are consistent in the vast majority of cases" (response to DMA/USPS-T12-3(b)), and which then asked you to "confirm that you have performed no quantitative analyses to support" that belief.

Your answer states in part that you "have not personally performed any quantitative analysis of the consistency between MODS activity and employee activity." Please provide citations and copies of, or if that is impossible describe the substance of, any analyses, quantitative or otherwise, of the consistency between MODS activity and employee activity in any of the following categories: (i) whose preparation you were associated with in any capacity; (ii) whose preparation was associated with the process of developing your new methodology for distributing mail processing costs; (iii) whose preparation Christiansen Associates was associated with in any capacity; (iv) that you were aware of at the time you prepared your testimony; or (v) that you are now aware of.