

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

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POSTAL RATE AND FEE CHANGES, 2006

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Docket No. R2006-1

FIRST SET OF INTERROGATORIES AND REQUESTS  
FOR PRODUCTION OF DOCUMENTS OF TIME WARNER INC.  
TO AMERICAN BUSINESS MEDIA (TW/ABM-1-7)  
(September 20, 2006)

Pursuant to sections 25, 26 and 27 of the rules of practice, Time Warner Inc. (Time Warner) hereby directs the following interrogatories and requests for production of documents to American Business Media (ABM).

Time Warner requests that, in responding to these requests, ABM follow the guidelines set out below.

With respect to each question and subpart thereof, if information is not available in the exact format or level of detail requested, please provide responsive material in such different format or level of detail as is available. If ABM is unable to provide current information, please provide the most recent information available and identify the date or period to which that information applies. If ABM is unable to provide complete information, please provide any partial or representative information available that is responsive to the question. If ABM objects to providing any requested information on grounds of confidentiality or commercial or other privilege, please provide the requested information in a coded or blind format to the extent that it is possible to do so consistent with the asserted privilege, or contact undersigned counsel to discuss possible limitations or alternative requests.

Respectfully submitted,

s/ \_\_\_\_\_  
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TW/ABM-1 The testimony of ABM witness Cavnar (ABM-T-1) refers to a DVD aimed at informing ABM members about the benefits of moving out of sacks.

- a. Please provide a copy of the DVD.
- b. Please provide copies of all other material, in hard-copy and electronic formats, used by ABM in the last three years to inform its members of the benefits of moving out of sacks, and of the practical issues that must be addressed by mailers who decide to reduce their reliance on sacks.

TW/ABM-2 ABM witness Cavnar indicates in his testimony, at page 3, that as of September 5, 2006 ABM's attorney had received "information on 127 publications from 8 publishers."

- a. As of the date of the filing of your answer to this interrogatory, on how many publications, and from how many publishers, has ABM's attorney received recent information?
- b. Please confirm that the eight publishers referred to by Mr. Cavnar are all ABM members. If not confirmed, how many are ABM members?
- c. Please describe fully the type of information that ABM received on the 127 publications, as well as any additional publications on which information has since been received. Please include in your answer the number of publications for which mail.dat files were received.
- d. Please describe all analyses that ABM has performed using the publication data referred to by Mr. Cavnar, and the conclusions reached to date.
- e. Please provide an answer from Mr. Cavnar to this subpart. Mr. Cavnar also refers to the information from 127 publications as "a return that may at this point be too small to be statistically significant." Please explain what precisely is meant by "statistically significant," what conclusions drawn based on this information are believed to not be "statistically significant," and the analysis that led to the characterization of those conclusions as not "statistically significant."

TW/ABM-3 Please provide the following information about each of the 127 publications on which ABM's attorney, according to Cavnar, had received information on September 5<sup>th</sup>, and on all publications about which information has been received since then. Please note that publication or publisher name is

not being requested in this or subsequent interrogatories. If you choose to not identify publications by name, please identify them by number. Please provide the information requested in the form of an electronic (Excel) spreadsheet. For each publication:

- a. Does it use mail.dat?
- b. Is it currently being: (1) comailed; or (2) co-palletized without co-mailing?
- c. Please provide the frequency of publication, average mailed volume per issue, average weight per piece and average percent editorial content.
- d. Indicate whether the publication is letter-shaped or flat-shaped.
- e. Do you believe the publication is AFSM-100 machinable? If the answer varies from issue to issue, due to weight or other factors, please so indicate and explain fully.
- f. Please indicate the percent entered in each postal zone, including the percent entered at the DDU, DSCF and DADC.
- g. Please indicate the percent of pieces mailed at each of the following rate categories: (1) carrier route, (2) 5-digit auto, (3) 5-digit non-auto, (4) 3-digit auto, (5) 3-digit non-auto, (6) basic auto, and (7) basic non-auto.
- h. Please indicate the percent of pieces that currently qualify for: (1) the per-piece discount for palletization; (2) the per-piece discount for being palletized as well as dropshipped; (3) the DDU entry piece discount; (4) the DSCF discount; and (5) the DADC discount.
- i. Is some of the publication's mailed volume airlifted before being turned over to the Postal Service? If yes, please state the percent of total mail volume that is airlifted. For the airlifted volume, please state also the average per-piece cost of the air-freight.
- j. Does the publication participate in one or more pooled drop shipments? If yes, what percent of the mailed volume is pooled in that way?
- k. Is it a requester publication?

TW/ABM-4 For each of the publications referred to in the preceding interrogatory that generates mail.dat files, please provide one such file for a recent representative issue of the publication. Please provide a file that represents a mailing that was in conformance with the recent regulation change requiring Periodicals sacks to contain a minimum of 24 pieces. Please exclude the mail.dat header file if you do not wish the name of the publication to be known.

TW/ABM-5 For each of the publications referred to in the preceding two interrogatories:

- a. Has ABM estimated the percent increase in its postage that will result from witness Tang's proposed rate design in this docket? If yes, please provide the percentage.
- b. Has ABM estimated the percent increase in its postage that will result from witness Mitchell's proposed rate design in this docket? If yes, please provide the percentage.
- c. Has ABM estimated the percent increase in its postage that will result from witness Glick's proposed rate design in this docket? If yes, please provide the percentage.

TW/ABM-6 For each of the publications referred to in the preceding three interrogatories that is either co-mailed or co-palletized:

- a. Please indicate the portion of the mailed volume that is comailed/co-palletized.
- b. Please indicate the total comailed or co-palletized volume of the comail/co-palletization pool in which the publication participates.
- c. What is the per-piece cost that the publication pays to participate in comailing/co-palletization?
- d. Under the current Periodicals rates, what are the average per-piece savings in postage that the publication realizes by participating in comailing/co-palletization?
- e. Under the Periodicals rates proposed on behalf of the Postal Service by witness Tang, what are the average per-piece savings in postage that the publication will realize by continuing to participate in comailing/co-palletization?

TW/ABM-7 For each of the publications referred to in the preceding interrogatories and for which you are not able to provide a representative mail.dat file, please provide the following information in an electronic spreadsheet format:

- a. The number of pallets with (1) 5-digit; (2) 3-digit or SCF and (3) ADC pallet presort. For each pallet presort level, please specify the number of such pallets that are entered at: (1) the DDU; (2) the DSCF; (3) the DADC; and (4) the DBMC.
- b. The number of sacks with (1) carrier route; (2) 5-digit; (3) 3-digit or SCF; (4) ADC and (5) Mixed ADC sack presort. For each sack presort level, please specify the number of such sacks that are entered at: (1) the DDU; (2) the DSCF; (3) the DADC; and (4) the DBMC.
- c. The number of bundles with: (1) carrier route; (2) 5-digit; (3) 3-digit or SCF; (4) ADC and (5) Mixed ADC bundle presort. For each bundle presort level, please specify how many are entered in sacks with each sack presort level and how many are entered on pallets with each pallet presort level.
- d. The number of pieces with and without pre-barcoding that is in bundles with each level of bundle presort.