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

POSTAL RATE AND FEE CHANGES, 2006	:	Docket No. R2006-1

RESPONSES OF TIME WARNER INC. WITNESS STRALBERG (TW-T-2)
TO INTERROGATORIES OF AMERICAN BUSINESS MEDIA
(ABM/TW-T1-7-9, REDIRECTED FROM WITNESS MITCHELL)
(October 3, 2006)

Time Warner Inc. (Time Warner) hereby provides the responses of witness Halstein Stralberg (TW-T-2) to American Business Media (ABM) interrogatories ABM/TW-T1-7-9, redirected from witness Robert W. Mitchell (TW-T-1) (filed September 19, 2006).

Each interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

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RESPONSES TO ABM/TW-T1-7-9, REDIRECTED TO WITNESS STRALBERG (TW-T-2)

ABM/TW-T1-7. Please describe in detail, and produce, all studies you or someone else performed for or on behalf of Time Warner to determine the effect of your proposal on Periodicals mailers.

RESPONSE: See my answers to ABM/TW-T1-8 and 9, which include all the publications on which I have analyzed to date the impact witness Mitchell's rate design would have. Due to a shortage of time, the only publications analyzed before the filing of Mitchell's testimony were the six Transworld publications, owned by Time Inc., and Time magazine.

ABM/TW-T1-8. Please provide information similar to that provided in Docket No. C2004-1 showing, for a recent and representative issue of each publication produced by Time Warner (names may be coded), the approximate mailed circulation, the approximate mailed circulation in its main file, the frequency, the percentage of the main file and the percentage of supplemental mailings mailed in sacks, whether or not the publication is now co-mailed or co-palletized, the percentage of pieces sorted to carrier route, the percentage of pieces on 5-digit or carrier route pallets, and postage per copy for the main file and for supplemental mailings at the present rates and at the rates you propose.

RESPONSE: See Tables ABM/TW-T1-8a and 8b. The first table summarizes the requested characteristics of the 42 Time Warner Periodicals that are distributed through the mail in the United States. Table ABM/TW-T1-8b shows, for a recent sample issue of each publication, and separately for the publication's main file and its supplemental mailings, the per-piece postage under current rates, the rates proposed by witness Tang and the rates proposed by witness Mitchell.

Many of Time Warner's publications use comailing or co-palletization for their supplemental files. Some use comailing or co-palletization also for their main file. Generally, when a mailing is comailed or co-palletized, the comailer (e.g. printer) keeps (and does not release to individual participants) some of the information (e.g., number of bundles, sacks and pallets in the total mailing) that would be necessary to determine postage for individual publications under the rates proposed by witness Mitchell or the rates proposed by witness Tang in this docket. Consequently it was impossible to provide all the requested information for the publications that do use comailing or co-palletization.

Table ABM/TW-T1-8a: Time Warner Publications Mailed In the United States

Pub No	Mailed Circulation		Freq.	% Pcs in Sacks		% Comail	% Copal	% Carrier Route	% on 5D Pallets
	Total	Main File		Main file	Supple-mental				
1	4154472	4154472	51	1.94%	0.00%	0.00%	0.24%	89.40%	16.92%
2	3138235	3138235	51	1.29%	0.00%	0.00%	0.61%	88.61%	7.76%
3	2346184	2346184	51	2.57%	0.00%	0.00%	0.00%	81.77%	8.84%
4	1860267	1860267	48	1.33%	0.00%	0.00%	0.00%	77.84%	3.33%
5	799753	795179	25	3.51%	100.00%	0.00%	0.00%	47.00%	4.11%
6	1869682	1839685	12	3.59%	100.00%	0.00%	0.00%	69.67%	12.72%
7	1079635	1068364	13	0.75%	100.00%	0.00%	0.00%	56.82%	37.86%
8	1604277	1454777	12	1.52%	24.60%	0.00%	0.00%	57.08%	28.30%
9	880980	826437	12	copal	copal	0.00%	6.89%	56.04%	copal
10	391561	376297	10	10.03%	100.00%	0.00%	0.00%	32.61%	1.54%
11	915949	845949	10	2.96%	100.00%	0.00%	0.00%	34.00%	0.75%
12	594927	590025	11	2.39%	100.00%	0.00%	0.00%	22.01%	0.19%
13	635129	551156	10	7.12%	100.00%	0.00%	0.00%	21.50%	3.42%
14	1566814	1451136	12	2.41%	55.26%	0.00%	0.00%	52.87%	7.53%
15	869781	779299	9	comail	comail	95.00%	0.00%	69.53%	comail
16	1384272	1192306	10	comail	comail	95.00%	0.00%	62.33%	comail
17	633755	599187	10	2.15%	100.00%	0.00%	0.00%	60.85%	0.00%
18	355643	310852	6	10.42%	100.00%	0.00%	0.00%	19.68%	3.82%
19	2664922	2523308	12	0.89%	37.31%	0.00%	0.00%	74.61%	42.94%
20	1503772	1349078	11	2.17%	comail	10.29%	0.00%	50.54%	comail
21	145298	144298	12	12.72%	100.00%	0.00%	0.00%	7.27%	0.00%
22	921190	893190	10	4.51%	comail	3.04%	0.00%	42.33%	comail
23	1188795	1162861	12	4.48%	comail	2.18%	0.00%	54.72%	comail
24	162499	159499	12	10.23%	100.00%	0.00%	0.00%	14.52%	0.00%
25	450047	395155	8	4.14%	comail	12.20%	0.00%	37.20%	comail
26	337752	257752	7	7.90%	comail	23.69%	0.00%	41.29%	comail
27	119551	116551	12	5.59%	100.00%	0.00%	0.00%	8.19%	0.00%
28	1152016	1127345	10	comail	comail	98.29%	0.00%	85.91%	comail
29	2273015	2076281	11	comail	comail	84.12%	0.00%	64.41%	comail
30	116594	106594	26	8.40%	100.00%	0.00%	0.00%	53.81%	0.00%
31	29055	29055	8	7.83%	none	0.00%	0.00%	39.38%	0.00%
32	809011	776011	12	0.70%	100.00%	0.00%	0.00%	47.69%	0.00%
33	1006601	1006601	10	comail	none	70.00%	0.00%	54.93%	comail
34	1312054	1259965	12	2.17%	comail	3.97%	0.00%	59.10%	comail
35	268603	258103	12	3.67%	100.00%	0.00%	0.00%	4.05%	0.00%
36	1404607	1283690	12	2.28%	59.87%	0.00%	0.00%	67.83%	30.79%
37	89035	81343	12	5.51%	copal	0.00%	8.64%	1.00%	0.00%
38	97668	65665	9	12.07%	copal	0.00%	32.77%	3.50%	0.00%
39	51801	50321	12	17.14%	copal	0.00%	2.86%	0.00%	0.00%
40	29355	28355	12	76.04%	copal	0.00%	3.41%	0.00%	0.00%
41	74175	57172	12	14.52%	copal	0.00%	22.92%	1.84%	0.00%
42	26208	24208	6	53.49%	copal	0.00%	7.63%	1.50%	0.00%

Table ABM/TW-T1-8b: Postage/Piece Under Different Rate Designs

Pub	Main file			Supplements		
No.	R2005-1	Tang	Mitchell	R2005-1	Tang	Mitchell
1	$0.164	$0.186	$0.171	none	none	none
2	$0.164	$0.185	$0.171	none	none	none
3	$0.207	$0.232	$0.222	none	none	none
4	$0.192	$0.215	$0.206	none	none	none
5	$0.302	$0.334	$0.331	$0.482	$0.554	$0.532
6	$0.267	$0.295	$0.289	$0.461	$0.536	$0.533
7	$0.610	$0.650	$0.676	$0.999	$1.147	$1.191
8	$0.505	$0.541	$0.567	$0.490	$0.534	$0.520
9	$0.304	copal	copal	$0.357	copal	copal
10	$0.271	$0.301	$0.303	$0.509	$0.573	$0.519
11	$0.305	$0.335	$0.336	$0.525	$0.594	$0.546
12	$0.282	$0.311	$0.317	$0.448	$0.518	$0.515
13	$0.412	$0.449	$0.462	$0.534	$0.615	$0.614
14	$0.316	$0.347	$0.347	$0.490	$0.550	$0.558
15	$0.302	comail	comail	$0.370	comail	comail
16	$0.288	comail	comail	$0.300	comail	comail
17	$0.214	$0.240	$0.230	$0.370	$0.435	$0.424
18	$0.346	$0.381	$0.398	$0.567	$0.649	$0.636
19	$0.291	$0.319	$0.310	$0.450	$0.510	$0.542
20	$0.234	$0.260	$0.255	$0.224	comail	comail
21	$0.278	$0.310	$0.315	$0.402	$0.467	$0.442
22	$0.231	$0.258	$0.255	$0.297	comail	comail
23	$0.235	$0.262	$0.262	$0.333	comail	comail
24	$0.278	$0.309	$0.313	$0.420	$0.487	$0.476
25	$0.285	comail	comail	$0.284	comail	comail
26	$0.257	$0.284	$0.281	$0.204	comail	comail
27	$0.487	$0.535	$0.546	$0.809	$0.933	$0.864
28	$0.227	comail	comail	$0.256	comail	comail
29	$0.266	comail	comail	$0.297	comail	comail
30	$0.296	$0.327	$0.421	$0.479	$0.543	$0.449
31	$0.332	$0.367	$0.519	$0.510	$0.580	$0.490
32	$0.211	$0.235	$0.232	$0.341	$0.393	$0.407
33	$0.209	comail	comail	none	none	none
34	$0.311	$0.339	$0.335	$0.310	comail	comail
35	$0.285	$0.315	$0.325	$0.475	$0.553	$0.536
36	$0.288	$0.317	$0.308	$0.514	$0.579	$0.568
37	$0.437	$0.479	$0.501	n.a.	copal	copal
38	$0.386	$0.425	$0.438	n.a.	copal	copal
39	$0.466	$0.512	$0.522	n.a.	copal	copal
40	$0.388	$0.438	$0.446	n.a.	copal	copal
41	$0.392	$0.435	$0.446	n.a.	copal	copal
42	$0.493	$0.556	$0.559	n.a.	copal	copal

ABM/TW-T1-9. Please provide the results in terms of postage per copy at present rates, postage per copy at the rates you propose and percentage increase between present rates and those proposed rates for the publications studied by USPS witness Tang in Docket No. C2004-1 and this one.

RESPONSE:

It is not possible at this time to determine how the rates proposed by witness Mitchell in this docket, or for that matter the rates proposed by witness Tang, would affect the 251 publications described by Tang in Docket No. C2004-1. That is because the only mail characteristics information currently available for those publications is that which applied when the data was collected several years ago, prior to Tang's use of that data in her response to POIR No. 2 in Docket No. C2004-1 (filed October 15, 2004).

As I pointed out in my Docket No. C2004-1 surrebuttal testimony (TW et al.-RT-2 at 7-10 [Tr. 5/1546-49]), many of the publications for which Tang provided data used sacks with very few pieces in them ("skin sacks"). A rate structure that makes mailers pay the actual cost of the sacks they are using would obviously lead to high rate increases for those that put only a few pieces in each sack.

Since May of this year, however, the Postal Service has required that all Periodicals sacks contain at least 24 pieces. This means that all publications that used "skin sacks" when Tang's data was collected must have a different mailing profile today. Not only must such publications be using fewer sacks, but other changes must have happened as well, such as a migration of bundles either to pallets or to sacks with a lower level of presort than the sacks they used to be in. This in turn may have affected entry points, etc.

Under the existing rate design, publications that use sacks would in many cases be required to pay slightly more in postage because of the changes described above. Under a cost based rate design such as that presented by witness Mitchell, many of the same publications would experience postage reductions, in some cases dramatic reductions. Comparisons based on older data are therefore essentially meaningless for the publications most affected by the 24 piece requirement.

I have, nevertheless, applied Mitchell's rates, proposed in this docket, to Tang's C2004-1 publication data, for those of Tang's publications whose average number of pieces per sack was at least 24. That leaves out 42 publications, which because of their high use of skin

sacks would have had to change their mailing practices significantly since Tang's data was collected. The results for the remaining 209 publications are summarized in Table ABM/TW-T1-9.[1]

The table contains two columns expressing percent rate differential. One shows how much the rates proposed by Mitchell would raise or lower the postage for a publication if its mail characteristics data were exactly the same as when Tang collected the data. The other shows the percent difference between the postage under Mitchell's proposed rates and the postage under Tang's proposed rates, again assuming no change in mail characteristics. Table rows are sorted according to the percent difference between postage under the Mitchell and Tang proposals.

As can be seen, the main factor that differentiates the impact of the two rate proposals is flats machinability, which is recognized as a cost driver in Mitchell's rates but not in Tang's. The nine publications where the percent difference in postage is greatest are all non-machinable.

In the event that someone might attempt to verify the results presented in Table ABM/TW-T1-9, I need to point out that I have corrected a mistake in witness Tang's "homework assignment" spreadsheet, contained in LR-L-173 and provided, under protective conditions, in response to a question posed by Chairman Omas at Tang's hearing. Among the 251 publications on which Tang provided data, 37 are identified as nonprofit. A nonprofit publication is entitled to a five percent discount relative to the postage it would have paid as a regular rate publication, except for the advertising pound rates, which by law must be the same for nonprofit and regular rate publications. As can be verified by examining Tang's spreadsheet, her formulas exaggerate considerably the nonprofit discount that most of her 37 nonprofits are entitled to, thereby understating the total postage they would pay. Without correcting this mistake, a comparison with the correctly calculated postage under Mitchell's

[1] Note that even publications with an average in excess of 24 pieces per sack may have had some sacks with fewer than 24 pieces. It is therefore likely that many of the publications in the table that primarily use sacks would do better under Mitchell's proposed rates than the table suggests.

proposal would make his rates for nonprofit publications look less favorable relative to hers than they really are.[2]

[2] Tang's nonprofit discounts are calculated in column Q (for R2005-1 rates) and W (for her proposed rates) on worksheet 'Summary' in her LR-L-173 spreadsheet. Examining the formulas used will show that she applies the 5% discount to a cost figure which consists of: (1) the piece rates before subtracting any of the piece rate discounts such as the editorial discount; (2) the advertising pound rates; and (3) her proposed container rate.

Table ABM/TW-T1-9: Impact of Mitchell's proposed Periodicals rates, versus current rates and those proposed by Tang, for Tang's publications with more than 24 pieces per sack

ID	% Edit	Lb/pc	Freq	Size	Density	Mach	Postage per piece			TW Rates Versus:		Pcs/ Sack
							R2005-1	Tang	TW	R2005-1	Tang	
P1HL48	98%	0.229	6	Large	High	M	12.78	14.31	11.99	-6.18%	-16.26%	44.23
P1HL33	62%	0.247	12	Large	High	M	13.00	15.27	12.98	-0.19%	-14.99%	50.58
QHS71	44%	0.080	50	Small	Low	M	40.11	45.36	39.16	-2.37%	-13.67%	88.00
QHS87	83%	0.112	22	Small	Low	M	35.60	39.87	34.68	-2.58%	-13.03%	193.00
QHS68	76%	0.126	22	Small	Low	M	35.74	40.53	35.39	-0.98%	-12.67%	71.60
QHS70	75%	0.123	23	Small	Low	M	36.56	41.10	35.89	-1.82%	-12.67%	143.33
QHS86	95%	0.148	26	Small	Low	M	31.64	35.84	32.02	1.21%	-10.67%	48.50
P1HM93	54%	0.567	6	Medium	High	M	27.28	30.07	27.12	-0.61%	-9.82%	38.11
P1HM74	59%	0.511	6	Medium	High	M	24.93	27.47	24.82	-0.44%	-9.65%	43.99
P1LM49	62%	0.595	4	Medium	Low	M	45.95	53.56	48.82	6.26%	-8.85%	64.22
L11	61%	0.427	12	Large	High	M	21.00	23.26	21.21	1.02%	-8.78%	44.77
QHS82	70%	0.133	48	Small	Low	M	36.75	41.93	38.25	4.10%	-8.77%	62.83
M9	62%	0.418	8	Medium	Low	M	20.87	23.12	21.19	1.54%	-8.35%	45.89
QHS85	43%	0.625	24	Small	Low	M	46.36	51.97	47.75	2.99%	-8.13%	39.31
QHS89	47%	0.346	365	Small	Low	M	42.43	48.49	44.56	5.02%	-8.12%	41.71
P1LM39	75%	0.625	8	Medium	Low	M	46.15	52.06	47.94	3.88%	-7.92%	41.14
QHS26	100%	0.099	12	Small	High	M	21.67	23.27	21.54	-0.59%	-7.45%	80.52
M10	57%	0.556	6	Medium	Low	M	25.41	27.93	25.91	1.96%	-7.23%	45.60
P1LM60	100%	0.444	6	Medium	Low	M	35.09	41.55	38.59	10.00%	-7.11%	80.89
QHS64	92%	0.630	22	Small	Low	M	45.99	54.15	50.77	10.38%	-6.26%	29.20
M20	58%	0.544	9	Medium	High	M	24.05	26.46	24.93	3.67%	-5.79%	47.76
L9	57%	0.531	8	Large	High	M	24.74	27.29	25.74	4.04%	-5.69%	44.67
P1HL34	77%	0.225	6	Large	High	M	14.91	16.89	15.97	7.17%	-5.41%	45.68
P1HL46	86%	0.232	12	Large	High	M	17.28	19.24	18.27	5.73%	-5.05%	66.15
P1HL19	50%	0.627	12	Large	High	M	28.88	31.84	30.24	4.72%	-5.02%	40.83
P1HL20	54%	0.658	10	Large	High	M	28.67	31.47	29.90	4.27%	-5.00%	35.94
P1HM83	61%	0.251	12	Medium	High	M	21.74	23.97	22.83	5.03%	-4.77%	82.00
QHS72	40%	1.732	12	Small	Low	M	88.71	100.10	95.47	7.62%	-4.62%	32.50
P1LM33	100%	1.128	12	Medium	Low	M	51.57	59.41	56.73	10.01%	-4.50%	35.31
P1HL29	55%	0.544	11	Large	High	M	25.46	28.11	26.89	5.63%	-4.31%	48.23
P1HM88	51%	0.583	9	Medium	High	M	25.40	27.99	26.80	5.51%	-4.25%	41.22
P1HL27	70%	0.906	12	Large	High	NM	34.74	37.80	36.26	4.37%	-4.07%	28.14
P1HL17	55%	0.637	10	Large	High	M	28.36	31.15	29.93	5.54%	-3.91%	32.59
P1HL47	55%	0.659	12	Large	High	M	26.97	29.54	28.44	5.45%	-3.73%	45.78
P1HM95	50%	0.449	6	Medium	High	M	22.70	25.20	24.29	7.02%	-3.61%	53.77
P1HL13	100%	0.660	15	Large	High	M	22.76	24.29	23.51	3.30%	-3.20%	27.19
M19	51%	0.581	9	Medium	High	M	26.13	28.75	27.85	6.58%	-3.14%	48.10
P1HM86	63%	0.251	12	Medium	High	M	27.48	30.19	29.25	6.41%	-3.12%	67.00

Table ABM/TW-T1-9: Impact of Mitchell's proposed Periodicals rates, versus current rates and those proposed by Tang, for Tang's publications with more than 24 pieces per sack (Continued)

							Postage per piece			TW Rates Versus:		Pcs/
ID	% Edit	Lb/pc	Freq	Size	Density	Mach	R2005-1	Tang	TW	R2005-1	Tang	Sack
QHS99	67%	0.330	12	Small	Low	M	35.64	41.44	40.38	13.31%	-2.57%	61.47
QHS30	59%	0.200	12	Small	High	M	24.40	26.98	26.29	7.75%	-2.55%	47.83
S22	90%	0.061	52	Small	High	M	14.18	16.15	15.75	11.06%	-2.52%	52.56
P1HL32	93%	0.248	12	Large	High	M	17.03	18.97	18.59	9.12%	-2.04%	66.43
P1HL42	43%	0.595	48	Large	High	NM	31.69	35.02	34.32	8.31%	-2.02%	33.42
P1HL23	44%	0.983	12	Large	High	M	33.51	36.45	35.74	6.64%	-1.96%	37.70
M5	27%	1.996	6	Medium	Low	NM	98.30	109.55	107.61	9.47%	-1.77%	25.63
P1HL31	74%	0.194	10	Large	High	NM	18.00	20.13	19.78	9.89%	-1.73%	55.51
P1HM73	57%	0.468	12	Medium	High	M	22.70	24.98	24.59	8.32%	-1.56%	40.37
P1HL44	50%	0.464	12	Large	High	M	24.81	27.46	27.04	8.98%	-1.56%	48.48
QHS59	76%	0.315	24	Small	High	M	20.21	22.46	22.17	9.70%	-1.32%	49.44
P1HM92	58%	0.566	6	Medium	High	M	27.54	30.26	29.87	8.49%	-1.29%	51.34
QHS56	71%	0.274	52	Small	High	M	25.79	30.36	29.98	16.23%	-1.27%	36.50
P1HL12	50%	0.836	12	Large	High	M	31.51	34.41	33.99	7.86%	-1.24%	25.52
P1LM36	60%	0.332	10	Medium	Low	NM	37.27	41.98	41.46	11.25%	-1.24%	40.39
P1HM94	63%	0.251	12	Medium	High	M	24.86	27.41	27.09	8.99%	-1.15%	59.87
P1HL41	71%	0.314	50	Large	High	M	23.31	25.71	25.45	9.17%	-1.04%	45.81
P1HL16	60%	1.187	12	Large	High	M	45.30	49.01	48.51	7.09%	-1.02%	25.75
P1LM26	100%	0.321	10	Medium	Low	M	30.49	34.99	34.66	13.67%	-0.95%	47.25
QHS36	100%	0.057	26	Small	High	M	17.52	18.70	18.55	5.83%	-0.85%	132.42
QHS63	39%	0.714	6	Small	Low	M	53.52	61.25	60.77	13.55%	-0.78%	35.36
QHS39	28%	0.125	17	Small	High	M	24.37	28.67	28.45	16.75%	-0.76%	35.76
L5	67%	0.278	10	Large	High	M	18.85	21.10	20.94	11.06%	-0.76%	50.89
P1HL40	51%	0.507	6	Large	High	M	24.99	27.51	27.31	9.29%	-0.71%	48.00
P1LM42	60%	0.353	9	Medium	Low	M	23.57	25.98	25.83	9.56%	-0.59%	51.01
L8	60%	0.591	12	Large	High	M	25.91	28.34	28.18	8.79%	-0.56%	41.44
QHS35	42%	0.298	27	Small	High	M	21.40	24.00	23.87	11.52%	-0.55%	47.56
P1LM34	53%	0.637	12	Medium	Low	M	44.95	50.86	50.62	12.62%	-0.47%	36.89
S9	100%	0.197	12	Small	Low	M	35.50	41.77	41.64	17.29%	-0.31%	35.50
P1HL38	59%	0.467	8	Large	High	M	23.78	26.13	26.06	9.59%	-0.28%	41.99
L6	64%	0.417	12	Large	High	M	22.19	24.55	24.48	10.31%	-0.28%	49.79
P1LM52	52%	0.525	12	Medium	Low	M	42.97	48.99	48.86	13.72%	-0.26%	45.79
P1HL30	50%	0.440	10	Large	High	M	24.71	27.33	27.28	10.41%	-0.18%	33.03
M3	50%	0.696	6	Medium	Low	M	47.01	52.93	52.85	12.42%	-0.15%	30.31
L4	50%	0.410	12	Large	High	M	25.53	28.36	28.33	10.96%	-0.11%	47.62
P1HL45	60%	0.375	12	Large	High	M	23.56	26.11	26.08	10.72%	-0.09%	52.42
M18	61%	0.414	6	Medium	High	M	22.81	25.14	25.14	10.23%	0.02%	41.63
QHS84	56%	0.489	12	Small	Low	M	37.54	42.45	42.56	13.38%	0.25%	61.03
P1HL51	57%	0.334	24	Large	High	M	26.71	29.88	29.96	12.17%	0.25%	50.09

Table ABM/TW-T1-9: Impact of Mitchell's proposed Periodicals rates, versus current rates and those proposed by Tang, for Tang's publications with more than 24 pieces per sack (Continued)

							Postage per piece			TW Rates Versus:		Pcs/
ID	% Edit	Lb/pc	Freq	Size	Density	Mach	R2005-1	Tang	TW	R2005-1	Tang	Sack
S21	35%	0.127	12	Small	High	M	26.08	30.08	30.17	15.69%	0.29%	55.00
S23	42%	0.483	52	Small	High	M	34.09	38.93	39.08	14.62%	0.38%	40.32
P1LM44	52%	0.602	6	Medium	Low	M	30.10	32.90	33.03	9.72%	0.40%	42.23
P1HM76	50%	0.445	12	Medium	High	M	26.93	29.83	29.99	11.35%	0.54%	46.35
P1HL25	64%	0.824	12	Large	High	M	31.60	34.30	34.52	9.23%	0.63%	28.06
P1HL15	49%	0.808	12	Large	High	NM	33.15	36.29	36.53	10.18%	0.67%	36.24
P1HM97	50%	0.498	12	Medium	High	M	28.02	30.95	31.16	11.21%	0.67%	41.46
QHS80	66%	0.216	12	Small	Low	M	32.42	38.04	38.32	18.19%	0.74%	48.10
P1HL37	78%	0.483	6	Large	High	M	28.80	31.89	32.13	11.58%	0.78%	60.19
P1HM98	78%	1.112	6	Medium	High	M	45.73	51.38	51.79	13.26%	0.80%	39.07
P1HM85	57%	0.319	11	Medium	High	M	36.07	42.12	42.46	17.71%	0.81%	45.46
M8	50%	0.488	10	Medium	Low	M	27.53	30.43	30.69	11.47%	0.85%	24.73
P1LM55	50%	0.401	6	Medium	Low	M	36.84	41.69	42.06	14.18%	0.87%	50.30
M17	50%	0.491	12	Medium	High	M	29.49	32.67	32.96	11.78%	0.91%	46.46
P1HM82	41%	0.782	26	Medium	High	M	32.44	35.41	35.75	10.19%	0.96%	36.71
P1LM40	75%	0.238	26	Medium	Low	M	30.42	34.57	34.92	14.78%	1.02%	53.42
P1LM27	51%	0.308	10	Medium	Low	M	36.58	42.56	43.01	17.56%	1.04%	44.90
P1LM35	50%	0.365	6	Medium	Low	M	35.97	40.79	41.25	14.66%	1.12%	54.42
P1LM43	61%	0.489	7	Medium	Low	M	39.56	45.38	45.92	16.08%	1.20%	43.33
L1	55%	0.389	8	Large	Low	M	34.72	39.23	39.75	14.47%	1.31%	52.49
S8	59%	0.195	12	Small	Low	M	32.02	37.40	37.90	18.38%	1.33%	51.83
P1HL18	45%	0.358	51	Large	High	M	24.79	27.55	27.95	12.72%	1.42%	39.93
P1LM22	45%	0.503	13	Medium	Low	M	42.33	48.33	49.02	15.80%	1.42%	43.89
P1LM28	59%	0.725	4	Medium	Low	M	41.19	46.69	47.37	15.00%	1.44%	42.21
L2	85%	0.461	6	Large	High	M	29.55	33.08	33.56	13.59%	1.46%	52.30
P1LM23	57%	0.793	12	Medium	Low	M	44.70	50.94	51.72	15.71%	1.53%	32.49
P1HL50	50%	0.473	12	Large	High	M	25.60	28.29	28.75	12.29%	1.62%	34.70
QHS90	63%	0.556	12	Small	Low	M	41.19	47.50	48.31	17.29%	1.71%	39.35
QHS65	99%	0.951	52	Small	Low	M	41.04	47.99	48.85	19.02%	1.78%	38.54
P1HL39	70%	0.829	12	Large	High	M	33.56	36.44	37.11	10.57%	1.83%	29.36
QHS73	100%	0.227	6	Small	Low	M	28.23	33.39	34.00	20.43%	1.84%	47.11
P1HL28	51%	0.583	12	Large	High	M	29.23	32.18	32.77	12.13%	1.85%	43.62
QHS88	50%	0.650	12	Small	Low	M	45.14	52.18	53.18	17.81%	1.92%	34.20
QHS32	83%	1.871	12	Small	High	NM	70.66	82.57	84.18	19.14%	1.94%	24.14
S6	86%	1.221	12	Small	Low	M	51.71	60.82	62.01	19.92%	1.96%	27.61
P1LM57	41%	0.448	6	Medium	Low	M	44.74	52.60	53.65	19.93%	2.01%	41.37
QHS34	100%	0.546	24	Small	High	M	30.69	35.95	36.69	19.56%	2.05%	44.35
M4	40%	0.529	13	Small	Low	M	42.72	48.78	49.81	16.59%	2.10%	41.77
P1HM79	51%	0.396	6	Medium	High	M	25.74	28.91	29.53	14.70%	2.12%	46.54
P1HM63	50%	0.923	12	Medium	High	M	50.37	56.36	57.58	14.31%	2.16%	36.78
S10	97%	0.110	26	Small	Low	M	24.11	28.04	28.68	18.95%	2.30%	64.24
P1HM70	47%	0.894	12	Medium	High	M	43.26	48.10	49.20	13.75%	2.30%	39.56
QHS75	77%	0.453	6	Small	Low	M	36.28	42.39	43.39	19.58%	2.36%	38.96
P1LM59	47%	0.437	12	Medium	Low	M	39.69	45.58	46.67	17.58%	2.40%	42.56

Table ABM/TW-T1-9: Impact of Mitchell's proposed Periodicals rates, versus current rates and those proposed by Tang, for Tang's publications with more than 24 pieces per sack (Continued)

							Postage per piece			TW Rates Versus:		Pcs/
ID	% Edit	Lb/pc	Freq	Size	Density	Mach	R2005-1	Tang	TW	R2005-1	Tang	Sack
M7	61%	0.649	4	Medium	Low	M	32.50	35.74	36.60	12.62%	2.42%	32.45
P1LM37	68%	0.477	12	Medium	Low	M	37.05	42.58	43.64	17.80%	2.49%	45.69
QHS94	46%	0.387	10	Small	Low	M	37.53	42.93	44.01	17.26%	2.52%	45.54
P1HL24	72%	0.699	6	Large	High	M	30.95	33.95	34.80	12.46%	2.53%	43.63
P1HM99	100%	0.202	6	Medium	High	M	20.42	22.45	23.03	12.79%	2.60%	51.98
QHS29	94%	0.246	4	Small	High	M	22.09	24.72	25.37	14.85%	2.62%	48.30
P1HM72	42%	0.363	12	Medium	High	M	36.38	41.31	42.40	16.56%	2.63%	48.56
S18	100%	0.075	12	Small	High	M	22.57	26.55	27.27	20.80%	2.70%	50.85
P1LM21	65%	0.793	6	Medium	Low	M	41.65	46.68	48.01	15.27%	2.84%	37.48
P1LM53	70%	0.411	6	Medium	Low	M	33.57	38.10	39.22	16.84%	2.92%	47.69
P1HM77	54%	0.580	12	Medium	High	M	33.08	36.71	37.80	14.26%	2.96%	40.22
P1LM30	44%	0.434	13	Medium	Low	M	30.69	34.18	35.23	14.80%	3.07%	43.75
L3	75%	0.470	12	Large	High	M	28.36	31.54	32.52	14.66%	3.10%	41.98
QHS74	84%	0.592	6	Small	Low	M	35.84	41.73	43.04	20.07%	3.13%	38.88
P1LM51	47%	0.309	4	Medium	Low	M	35.92	41.41	42.76	19.05%	3.26%	44.98
QHS50	100%	0.320	251	Small	High	M	25.38	28.98	29.93	17.96%	3.30%	54.14
QHS25	44%	0.196	52	Small	High	NM	18.23	20.88	21.58	18.40%	3.34%	39.56
P1LM47	81%	0.297	6	Medium	Low	M	22.38	25.29	26.16	16.90%	3.42%	48.59
QHS69	34%	0.291	12	Small	Low	M	36.15	41.49	42.91	18.68%	3.43%	46.50
P1HM80	72%	0.238	52	Medium	High	M	24.31	27.44	28.40	16.82%	3.49%	41.41
P1HM100	86%	2.309	6	Medium	High	M	66.24	73.75	76.39	15.32%	3.57%	26.17
P1LM50	77%	0.628	6	Medium	Low	M	37.65	42.77	44.37	17.85%	3.75%	45.38
QHS42	66%	0.526	10	Small	High	M	35.90	41.44	43.03	19.87%	3.83%	39.83
P1HM66	88%	0.389	12	Medium	High	M	28.29	31.91	33.17	17.25%	3.93%	60.05
QHS54	100%	0.175	36	Small	High	M	20.76	23.32	24.26	16.84%	4.01%	60.21
P1HM91	60%	0.412	12	Medium	High	M	31.05	35.15	36.61	17.93%	4.17%	46.77
P1LM48	89%	0.310	4	Medium	Low	M	28.71	33.01	34.39	19.76%	4.18%	51.95
M12	100%	0.574	12	Medium	High	M	28.24	31.64	32.98	16.81%	4.26%	37.63
S7	100%	0.107	6	Small	Low	M	25.68	30.53	31.86	24.08%	4.35%	43.47
QHS67	87%	0.465	6	Small	Low	M	33.46	39.00	40.70	21.63%	4.36%	40.40
S24	33%	1.200	365	Small	High	NM	43.86	49.42	51.59	17.64%	4.39%	25.23
QHS97	66%	0.274	13	Small	Low	M	32.13	37.05	38.70	20.42%	4.45%	45.53
P1HL43	62%	0.191	51	Large	High	M	23.31	25.87	27.02	15.93%	4.46%	31.28
P1HM84	92%	0.363	8	Medium	High	M	26.95	30.33	31.71	17.66%	4.55%	54.46
QHS83	100%	0.455	4	Small	Low	M	32.79	39.16	40.94	24.87%	4.56%	35.09
QHS47	70%	0.258	11	Small	High	M	27.79	32.36	33.85	21.81%	4.61%	42.86
M15	51%	0.758	12	Medium	High	M	44.73	49.72	52.03	16.31%	4.63%	28.03
P1LM46	50%	0.307	6	Medium	Low	M	34.24	39.36	41.24	20.44%	4.79%	44.83
QHS31	99%	0.770	52	Small	High	M	34.32	39.50	41.46	20.78%	4.96%	46.78
M6	45%	1.195	4	Medium	Low	NM	56.10	62.47	65.65	17.02%	5.09%	32.07
P1HL49	73%	0.200	26	Large	High	M	23.83	26.50	27.85	16.87%	5.09%	81.37
P1HM89	49%	0.358	12	Medium	High	M	34.15	39.03	41.04	20.20%	5.17%	43.60
QHS77	80%	0.188	12	Small	Low	M	26.44	30.53	32.17	21.67%	5.36%	48.94
QHS96	100%	0.662	12	Small	Low	M	32.84	38.26	40.33	22.79%	5.39%	38.54

Table ABM/TW-T1-9: Impact of Mitchell's proposed Periodicals rates, versus current rates and those proposed by Tang, for Tang's publications with more than 24 pieces per sack (Continued)

							Postage per piece			TW Rates Versus:		Pcs/
ID	% Edit	Lb/pc	Freq	Size	Density	Mach	R2005-1	Tang	TW	R2005-1	Tang	Sack
P1HM96	57%	0.339	12	Medium	High	M	28.29	32.09	33.84	19.59%	5.43%	47.41
QHS79	28%	0.120	4	Small	Low	M	33.39	39.25	41.40	24.00%	5.47%	41.24
QHS48	99%	0.672	52	Small	High	M	31.88	36.54	38.55	20.93%	5.49%	49.41
P1LM56	81%	0.235	25	Medium	Low	M	27.43	31.44	33.21	21.07%	5.64%	54.01
QHS53	100%	0.520	12	Small	High	M	28.22	32.34	34.17	21.11%	5.67%	59.75
P1HM78	82%	0.623	12	Medium	High	M	37.01	42.83	45.37	22.58%	5.94%	37.90
P1HM67	85%	0.341	12	Medium	High	NM	24.61	27.74	29.43	19.61%	6.10%	52.03
P1HM62	94%	0.228	52	Medium	High	M	22.98	26.32	27.97	21.75%	6.28%	49.84
P1LM41	80%	0.245	52	Medium	Low	M	29.44	34.28	36.46	23.83%	6.34%	40.74
QHS27	79%	0.242	6	Small	High	M	27.80	32.16	34.23	23.12%	6.45%	47.65
QHS49	63%	0.282	53	Small	High	NM	22.91	26.03	27.71	20.96%	6.45%	36.63
S4	100%	0.357	4	Small	Low	M	28.05	32.78	34.93	24.53%	6.55%	40.97
P1LM24	95%	0.154	8	Medium	Low	M	25.06	29.48	31.44	25.46%	6.64%	43.23
P1LM29	95%	0.154	8	Medium	Low	M	25.06	29.48	31.44	25.46%	6.64%	43.23
P1LM38	95%	0.154	6	Medium	Low	M	25.06	29.48	31.44	25.46%	6.64%	43.23
P1LM54	95%	0.154	6	Medium	Low	M	25.06	29.48	31.44	25.46%	6.64%	43.23
QHS55	100%	0.080	26	Small	High	M	17.98	20.45	21.84	21.50%	6.79%	55.24
P1LM31	78%	0.245	52	Medium	Low	M	30.19	35.41	37.86	25.41%	6.91%	36.08
P1LM32	100%	0.533	13	Medium	Low	M	31.44	36.60	39.13	24.46%	6.92%	41.42
P1HM81	95%	0.244	6	Medium	High	M	22.23	25.24	27.01	21.48%	6.99%	47.96
S15	97%	0.389	52	Small	Low	M	27.45	31.55	33.75	22.96%	7.00%	49.36
QHS44	61%	0.101	52	Small	High	M	22.67	25.84	27.71	22.24%	7.23%	47.73
P1LM58	91%	0.135	20	Medium	Low	M	23.36	27.12	29.13	24.68%	7.43%	48.89
P1HM69	76%	0.309	12	Medium	High	M	27.50	31.55	33.92	23.34%	7.52%	45.16
L7	60%	1.481	12	Large	High	NM	50.60	54.47	58.58	15.76%	7.55%	24.20
M2	96%	0.383	6	Medium	Low	M	28.88	33.42	35.96	24.54%	7.60%	45.59
M13	62%	0.184	12	Medium	High	M	23.41	26.60	28.73	22.73%	8.04%	29.85
S16	41%	0.282	52	Small	High	M	24.38	28.52	31.04	27.32%	8.83%	35.09
P1HM65	100%	0.095	12	Medium	High	M	21.28	24.33	26.55	24.77%	9.11%	59.24
QHS58	100%	0.456	52	Small	High	M	26.54	30.79	33.86	27.57%	9.95%	31.03
QHS57	50%	0.145	52	Small	High	M	23.86	27.87	30.96	29.76%	11.10%	39.57
S19	75%	0.150	52	Small	High	M	19.61	22.57	25.13	28.10%	11.32%	49.04
P1HM75	100%	1.717	13	Medium	High	NM	51.47	58.77	66.33	28.87%	12.87%	34.93
M14	41%	0.980	15	Medium	High	NM	49.77	55.40	62.72	26.03%	13.21%	41.09
S17	98%	0.460	52	Small	Low	M	29.83	35.74	40.56	35.98%	13.48%	27.93
QHS78	99%	1.251	16	Small	Low	NM	46.20	54.13	61.55	33.24%	13.72%	33.05
M1	100%	0.452	13	Medium	Low	NM	29.81	34.51	39.93	33.95%	15.71%	43.89
P1HM64	80%	0.790	12	Medium	High	NM	35.76	40.22	46.54	30.14%	15.71%	38.06
QHS41	100%	0.251	54	Small	High	NM	27.86	33.24	38.67	38.83%	16.36%	24.15
P1HM68	70%	0.611	18	Medium	High	NM	37.02	41.85	48.83	31.90%	16.69%	43.64
P1HM87	61%	0.504	12	Medium	High	NM	36.23	41.02	48.37	33.50%	17.92%	41.76
M11	85%	0.396	12	Medium	High	NM	28.96	32.37	38.72	33.70%	19.63%	57.02
P1HM90	100%	0.383	4	Medium	High	NM	25.50	28.98	35.15	37.84%	21.29%	42.55
QHS66	80%	0.167	53	Small	Low	NM	31.42	36.76	46.22	47.12%	25.73%	98.59