

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

INTERROGATORIES OF THE UNITED STATES POSTAL SERVICE TO
TIME WARNER INC. WITNESS MITCHELL
(USPS/TW-T3-9-14)

Pursuant to Rules 25 and 26 of the Commission's Rules of Practice and Procedure, the United States Postal Service directs the following interrogatories to Time Warner Inc. witness Mitchell: USPS/TW-T3-9-14.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

Elizabeth A. Reed

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-3179 Fax -6187
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USPS/TW-T3-9. Please refer to page 1, lines 5-8 of your testimony. Is it your testimony that the QBRM discount for letters should be either 3.2 cents or 4.0 cents, and that the QBRM discount for cards should be either 2.9 cents or 3.5 cents? If this is not your testimony, please explain fully.

USPS/TW-T3-10. Please refer to page 3, lines 23-25; page 3, lines 25-27; page 5, lines 2-4; and page 5, lines 13-14 of your testimony. Please explain why you have only mentioned envelopes in these general references to QBRM.

USPS/TW-T3-11. Please refer to page 5, line 27 of your testimony. Would your sentence be more accurate if it read, “a considerable number of reply pieces are distributed...” rather than “a considerable number of reply pieces are sent out...”? Please explain fully.

USPS/TW-T3-12. Please refer to page 5, line 24 through page 6, line 5 of your testimony, where you discuss the “multiplier effect” of BRM. In your view, is BRM a mail product with a high value of service under 39 U.S.C. § 3622(b)(2) because of this multiplier effect?

USPS/TW-T3-13. Please refer to page 6, lines 8-11 of your testimony. Please confirm the following:

- (a) The QBRM with a quarterly fee per-piece fee was decreased from 1 cent to .8 cent as a result of Docket No. R2001-1. If you do not confirm, please explain.
- (b) The QBRM without a quarterly fee per-piece fee is proposed (in this proceeding) to decrease from 6 cents to 5 cents. If you do not confirm, please explain.
- (c) The QBRM quarterly fee is proposed (in this proceeding) to decrease from \$1,900 to \$1,800. If you do not confirm, please explain.

USPS/TW-T3-14 Please refer to page 8, lines 21-22 of your testimony. When you refer to the price of QBRM, are you speaking of the price paid for the return piece of QBRM only? Please explain fully.