

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

RESPONSES OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF TIME WARNER INC.  
(TW/USPS-7-8)

The United States Postal Service hereby files its responses to the above-listed interrogatories, filed on October 24, 2006.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

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David H. Rubin  
Attorney

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2986; Fax -6187  
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RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF TIME WARNER INC.

**TW/USPS-7** The following questions concern the Periodicals data filed as LR-L-189, in response to the Commission's request in POIR19.

- a. Please confirm that of the 158 publications for which data filed on October 16 was extracted from the Postal-One database, 27 are considered non-machinable. If not confirmed, please provide the correct number.
- b. Please confirm that of the 30 publications for which data filed on October 16 were obtained from a separate survey, 7 are considered non-machinable. If not confirmed, please provide the correct number.
- c. Were the criteria used in this latest survey to establish "machinability" identical to the criteria for "AFSM-100 machinability" used in collecting the data described in LR-L-91? If they were not identical, please describe all differences in the two sets of criteria.
- d. Please state the criteria and methodology based upon which machinability was established for: (1) publications whose data was collected through Postal-One; and (2) publications whose data was collected through a separate survey.
- e. For each publication in LR-L-189 that is identified as "non-machinable," including those whose data were included later than 10-16-2006, please specify why it was so identified, e.g., excess weight, too wide, too short, etc. For publications identified as "non-machinable" based upon the MPU records in their mail.dat files, please provide all other mail.dat information that could impact machinability, including piece weight, piece width and piece length, also included in the MPU records.

**RESPONSE:**

- a. In the revised LR-L-189 filed on October 31, 2006, 47 of the 158 sample publications from the PostalOne eVS system had volume determined not to be AFSM-100 compatible.
- b. In the revised dataset submitted on October 31, 2006, 22 of the 101 publications in worksheet "Sample" contain "non-Machinable" volume.
- c-d. In both LR-L-91 and the publication data provided in response to POIR No. 19, the term "machinability" is intended to refer to the AFSM 100 machinability standards as defined in DMM 301.3.3. However, the

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methodology for determining “machinability” in LR-L-91 and the response to POIR No. 19 are not identical. In LR-L-91, for publications with annual circulation less than 15,000 pieces, BMEU clerks were asked to determine if the piece met AFSM 100 machinability standards and provide actual measurements of length, height, and thickness of the publication. The measurements and the machinability response were then compared for consistency. If there was a conflict between the reported machinability and the measurements, the BMEU was contacted to determine if the piece failed any of the other DMM 301.3.3 criteria, such as deflection, turnability or polywrap standards. In the response to POIR No. 19, BMEU’s were asked to establish machinability based on memory and experience since pieces were not available for inspection and measurement. For the observations obtained through the PostalOne eVS system, the only AFSM-100 compatibility field in the MPU file was used for the initial filing. Subsequently the MPU AFSM 100 compatibility field was over-ridden if the length, height, weight or thickness indicated the piece failed DMM 301.3.3 AFSM 100 machinability standards. If the MPU AFSM 100 compatibility field indicated the piece was not AFSM compatible, but the piece met the weight, height, length, and thickness criteria for AFSM 100 compatibility, it is assumed the piece failed one of the AFSM 100 compatibility criteria not recorded in the mail.dat.

e. For observations collected through qualification reports, the criteria, other

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than weight, for determining AFSM-100 compatibility are not retained. For eVS observations a database of relevant MPU fields has been added today as worksheet "TW-7e Data" to library reference L-189 (under protective conditions). In the database a unique publication identifier for the current set of publications has been provided. The database includes the following fields for those publications:

R2006-1 Publication ID

Mailing Job number – In the response to POIR No. 19 all available mail.dat files available in the eVS system for the months of August and September are used. The job number identifies unique mail.dat files.

MPU ID – A identifier for each MPU record in the mail.dat

PUB-MPU– the R2006-1 Publication ID is listed when the MPU record belongs to the corresponding publication. All other publications in the COMAIL pool are listed as "OTHER".

Pieces – Total pieces for each MPU record

COMAIL – "COMAIL" indicates a mailing with multiple publications. "SINGLE" indicates mailings containing a single publication.

Data as reported in the mail.dat MPU file for:

- AFSM-100 compatability
- Weight
- Length
- Height
- Thickness

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**TW/USPS-8** The following questions refer to the use of the label "COMAIL" in LR-L-189.

- a. Please confirm that of the 158 Postal-One publications whose data are provided in LR-L-189, 85, or 53.8%, are shown with the label "COMAIL" in Column A.
- b. Please confirm that the label "COMAIL" was used each time any portion of a publication's mailed volume was comailed, even if it consisted only of supplemental copies. If not confirmed, based upon what criteria was the label "COMAIL" applied?
- c. Please confirm that in each case when a publication was found to have had at least some of its volume comailed, the volumes for which you provide mail characteristics data include the comailed volumes of all other publications that the given publication was comailed with. If not confirmed, please explain.
- d. For each publication to which the "COMAIL" label has been applied in LR-L-189, please provide an estimate of the percent of that publication's mailed volume that is comailed.

**RESPONSE:**

- a. Confirmed.
- b. Confirmed.
- c. Partially confirmed. If the publication is in both comailed jobs and jobs where it was the only publication, the reported volume is the sum of the volume of the comailed jobs that contained the publication and the jobs where the publication appeared by itself. Jobs that include the publications that the publication was comailed with but do not include the publication in question are not included.
- d. Columns EW to EZ have been added to worksheet "eVS" in LR-L-189 (under protective conditions), as revised October 31, 2006, providing the total volume in comailed jobs, the publication's volume in comailed jobs, and the volume in jobs where the publication appeared by itself.