

Revised Response of Time Warner Inc. Witness Stralberg (TW-T-2) to ABM/TW-T1-8, Redirected from Witness Mitchell (Errata) (filed December 5, 2006).⁵

Time Warner further moves that these documents, with the exceptions of TW-LR-5 Revised and TW-LR-6 Revised (Under Protective Conditions), be transcribed into the record. Two copies of said documents are today being provided to the Secretary of the Commission.

Each of the listed documents required revision subsequent to admission of the original version into evidence for the same reason. On November 7, 2006, the day before the hearing on the testimony of witness Mitchell (TW-T-1), Time Warner became aware of an anomaly in the Periodicals rate schedule proposed by witness Mitchell: the piece rate for non-machinable pieces that *are* pre-barcoded was greater than the piece rate for non-machinable pieces that *are not* pre-barcoded, even though the costs of each had been recognized. Consideration of possible adjustments to remedy the anomaly was not possible in the brief time remaining prior to Mr. Mitchell's hearing. Subsequent analysis revealed an error in the aggregation of the carrier route pieces in carrier route and carrier routes sacks, which caused inappropriate weights to be used in the development of average piece costs for 5-digit and, to a more limited extent, carrier route pieces.

Since the original versions of the responses and library references listed above included either Mitchell's proposed rate schedule itself or calculations based on it, correction of the anomaly required revision of those documents.

As stated in the Notice of Time Warner Inc. of Filing Library Reference TW-LR-5 Revised (Errata) (filed November 14, 2006), correction of the anomaly resulted, after rounding, in a decline in most piece rates of 0.2 cents per piece and

⁵ Earlier revised response appears at Tr. 31/10537-40.

an increase in the 5-digit piece rates of 0.1 cents for automation machinable pieces, 0.3 cents for automation non-machinable pieces, 0.9 cents for machinable (non-automation), and 1.9 cents for non-machinable (non-automation) pieces. No other rates were affected. As further stated in that Notice, correction of the anomaly did not result in any significant change to the rate comparisons provided in witness Stralberg's original response to POIR No. 19. Consequently, Time Warner does not believe that the interests of any participant would be prejudiced by the granting of this motion.

Respectfully submitted,

s/

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