

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

POSTAL RATE AND FEE CHANGES, 2006 : Docket No. R2006-1
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REVISED RESPONSE OF TIME WARNER INC. WITNESS STRALBERG (TW-T-2)
TO ABM/TW-T1-8, REDIRECTED FROM WITNESS MITCHELL (ERRATA)
(December 5, 2006)

Time Warner Inc. (Time Warner) hereby provides the revised response of witness Halstein Stralberg (TW-T-2) to American Business Media (ABM) interrogatory ABM/TW-T1-8, redirected from witness Mitchell (TW-T-1) (filed September 19, 2006).

The circumstances requiring this revision are explained in the body of the revised response.

The interrogatory is stated verbatim and followed by the revised response.

Respectfully submitted,

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**REVISED RESPONSE OF WITNESS STRALBERG (TW-T-2) TO
ABM/TW-T1-8, REDIRECTED FROM WITNESS MITCHELL**

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.

INTRODUCTION TO REVISED RESPONSE

Table 8b in my original response, filed on October 3, 2006 and revised on October 26, 2006, which was admitted into evidence at Tr. 31/10533 and transcribed at Tr. 31/10537-40, includes estimates of the per-piece postage that 42 Time Warner publications would pay under the Periodicals rates proposed by Time Warner witness Mitchell. On November 14 Time Warner filed a correction to witness Mitchell's proposed rate schedule. (See Revised Response of Time Warner Inc. Witness Mitchell to POIR No. 18, Item A, Part 1 of 2 [Errata], filed November 14, 2006.) This requires a further revision in my response to ABM/TW-T1-8. The revised response below, which incorporates the revisions filed on October 26, applies Mitchell's corrected rate schedule in Table 8b. There are no changes to the narrative portion of the response or to Table 8a.

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	Supplemental				
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 No.	Main file			Supplements		
	R2005-1	Tang	Mitchell	R2005-1	Tang	Mitchell
1	\$0.164	\$0.186	\$0.170	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	\$0.333	\$0.482	\$0.554	\$0.530
6	\$0.267	\$0.295	\$0.291	\$0.461	\$0.536	\$0.531
7	\$0.610	\$0.650	\$0.682	\$0.999	\$1.147	\$1.189
8	\$0.505	\$0.541	\$0.572	\$0.490	\$0.534	\$0.532
9	\$0.304	copal	copal	\$0.357	copal	copal
10	\$0.271	\$0.301	\$0.307	\$0.509	\$0.573	\$0.518
11	\$0.305	\$0.335	\$0.339	\$0.525	\$0.594	\$0.545
12	\$0.282	\$0.311	\$0.322	\$0.448	\$0.518	\$0.513
13	\$0.412	\$0.449	\$0.469	\$0.534	\$0.615	\$0.612
14	\$0.316	\$0.347	\$0.350	\$0.490	\$0.550	\$0.557
15	\$0.302	comail	comail	\$0.370	comail	comail
16	\$0.288	comail	comail	\$0.300	comail	comail
17	\$0.214	\$0.240	\$0.231	\$0.370	\$0.435	\$0.422
18	\$0.346	\$0.381	\$0.407	\$0.567	\$0.649	\$0.634
19	\$0.291	\$0.319	\$0.310	\$0.450	\$0.510	\$0.541
20	\$0.234	\$0.260	\$0.256	\$0.224	comail	comail
21	\$0.278	\$0.310	\$0.317	\$0.402	\$0.467	\$0.440
22	\$0.231	\$0.258	\$0.256	\$0.297	comail	comail
23	\$0.235	\$0.262	\$0.263	\$0.333	comail	comail
24	\$0.278	\$0.309	\$0.316	\$0.420	\$0.487	\$0.474
25	\$0.285	comail	comail	\$0.284	comail	comail
26	\$0.257	\$0.284	\$0.282	\$0.204	comail	comail
27	\$0.487	\$0.535	\$0.553	\$0.809	\$0.933	\$0.862
28	\$0.227	comail	comail	\$0.256	comail	comail
29	\$0.266	comail	comail	\$0.297	comail	comail
30	\$0.296	\$0.327	\$0.414	\$0.479	\$0.543	\$0.455
31	\$0.332	\$0.367	\$0.414	\$0.510	\$0.580	\$0.474
32	\$0.211	\$0.235	\$0.232	\$0.341	\$0.393	\$0.406
33	\$0.209	comail	comail	none	none	none
34	\$0.311	\$0.339	\$0.338	\$0.310	comail	comail
35	\$0.285	\$0.315	\$0.330	\$0.475	\$0.553	\$0.534
36	\$0.288	\$0.317	\$0.308	\$0.514	\$0.579	\$0.567
37	\$0.437	\$0.479	\$0.512		copal	copal
38	\$0.386	\$0.425	\$0.440		copal	copal
39	\$0.466	\$0.512	\$0.530		copal	copal
40	\$0.388	\$0.438	\$0.445		copal	copal
41	\$0.392	\$0.435	\$0.450		copal	copal
42	\$0.493	\$0.556	\$0.558		copal	copal