

ORIGINAL

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

UNITED STATES POSTAL SERVICE FOLLOW-UP
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO
TIME WARNER, INC. WITNESS STRALBERG
(USPS/TW-T1-30)

Pursuant to rules 25 and 26 of the Rules of Practice and Procedure and rule 2 of the Special Rules of Practice, the United States Postal Service directs the following interrogatories and requests for production of documents to Time Warner, Inc. witness Stralberg: USPS/TW-T1-30.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking




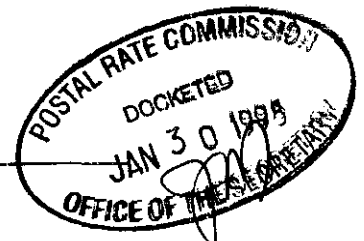
Eric P. Koetting

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2992; Fax -5402
January 30, 1998


Eric P. Koetting



Postal Service Follow-up Interrogatories for TW Witness Stralberg

USPS/TW-T1-30. Please refer to your response to USPS/TW-T1-7, and spreadsheet Items.xls, TW-LR-H-3.

- (a) Please confirm that the "counted" data in the tables provided at pages 2 to 8 of USPS/TW-T1-7 were obtained from datasets TW28emdr, TW28enmr, and TW28ebmr, USPS-LR-H-296. If you do not confirm, please explain fully.
- (b) Please confirm that there are several negative numbers entered in the "direct" columns of the tables provided at pages 2 to 8 of USPS/TW-T1-7, e.g., -\$354,000 for the "Other" subclass category in Table 5-1m. If you do not confirm, please explain fully.
- (c) Please confirm that if you had computed the "direct" volume variable costs using the formula at page 10, line 19 of your testimony, you should not have obtained negative "direct" costs, since "TC(I)," "POOLCOST(K)," "VV(K)" and "TCP(K)" are all positive numbers for every tally and cost pool. If you do not confirm, please explain fully.
- (d) If you confirm part c, please explain in detail how you obtained negative "direct" cost estimates. Please provide electronic spreadsheet calculations, SAS code, and/or any other supporting documentation as necessary.