

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

**Complaint of Time Warner Inc. et al.            )  
Concerning Periodicals Rates                )    Docket No. C2004-1**

**NOTICE OF INTERVENTION OF AMERICAN BUSINESS MEDIA**

Pursuant to Section 20 the Commission's Rules of Practice and Order No. 1399 issued March 26, 2004, American Business Media hereby notices its intervention as a full participant in the above-captioned docket.

American Business Media is an association of the nation's leading publishers of business, professional and medical periodicals, which are mailed almost exclusively at the regular Periodicals rates. American Business Media members publish more than 1,300 periodicals and pay roughly \$300,000,000 in Periodicals postage alone. They also use substantial amounts of First-Class and Standard mail. The complaint initiating this docket seeks a total overhaul of the Periodicals rate structure in a manner that would likely impose postal rate increases, in some cases greater than 50%, upon thousands of publications, including most American Business Media member publications. Accordingly, this docket may have a substantial impact on all American Business Media members.

American Business Media intends to participate actively in the hearing in this proceeding through the conduct of discovery and cross-examination and the presentation of witnesses.

American Business Media also wishes to express its disappointment that the Commission (Order 1399 at 16) concluded that this matter should be set for hearing at this time without providing an opportunity to those who are the *de facto* targets of the complaint to be heard. Although the Postal Service is the nominal respondent, the complaint does not suggest that the Postal Service should forego any revenues, only that its revenue requirement from the Periodicals class should be obtained differently—that is, less from the complainants, more from nearly everyone else. While the Commission has correctly noted that those who would be adversely affected by the changes sought in the complaint “will have an opportunity to address issues of concern to them throughout the hearing process,” they can do so only at a substantial cost. Perhaps nothing that American Business Media and others might have said could have diverted the Commission from this course of action, but, we submit, they should have been afforded the opportunity.

American Business Media requests that the following name be included  
on the service list in this docket:

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Respectfully submitted,

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March 30, 2004

## CERTIFICATE OF SERVICE

I hereby certify that on this 30th day of March, 2004, a copy of the foregoing document was served in accordance with Section 12 of the Commission's Rules of Practice.

/s/ David R. Straus  
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