

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

**Complaint of Time
Warner Inc. et al.
Concerning Periodicals Rates**

) **Docket No. C2004-1**

**SECOND INTERROGATORIES AND
REQUESTS FOR PRODUCTION OF DOCUMENTS
OF AMERICAN BUSINESS MEDIA
TO TIME WARNER INC., ET AL. WITNESS STRALBERG
ABM/TW et al.-T2-34-36
(June 4, 2004)**

Pursuant to Rules 25 through 28 of the Rules of Practice, American Business Media hereby submits interrogatories and requests for production of documents to Time Warner, Conde Nast, Newsweek, Readers Digest and TV Guide ("complainants"). American Business Media asks that, in responding to these requests, the complainants follow the guidelines set forth in American Business Media's first set of interrogatories to Witness Mitchell.

Respectfully submitted,

/s/ David R. Straus
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Attorney for American Business Media

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ABM/TW et al.-T2-34. Please provide an estimate of the postage that would be paid at the current Standard rates for the main file issues of the following publications that are analyzed in your response to ABM/TW-T1-3, redirected from witness Mitchell: Time, Time for Kids, In Style, Modern Bride, Golf World, Reader's Digest, Newsweek, TV Guide. In response to this question, you may, if you choose, assume that the current bundling and other mailing characteristics comply with the somewhat different standards that apply to Standard mail. If any of these publications could not be mailed at Standard rates, provide the information for the lowest rate at which it could be mailed (other than Periodicals).

ABM/TW et al.-T2-35. How would the publications listed in ABM/TW et al.-T2-34 modify their mailing practices if they were required to be mailed at Standard rates?

ABM/TW et al.-T2-36. Please respond to the following questions related to your response to ABM/TW-T1-3, redirected from witness Mitchell:

(a) Please explain why Time for Kids has only 1.04 pieces per bundle and state how, if at all, it would change its mailing practices if the rates proposed by witness Mitchell were adopted.

(b) Please explain why only 4.07% of BMX is palletized, provide its mailed per-copy circulation, and state where it is printed, and how, if at all, it would change its mailing practices if the rates proposed by witness Mitchell were adopted.

(c) Please explain why, if DNR, Footware and the other publications listed in the first column of page 12 of the data are co-mailed, only 65.6% of the copies are palletized.

(d) Why are only 36.99% of the copies of Executive Technology (page 12) palletized, and where is it printed?

(e) Please explain why 23% of the pieces of American Woodworker (page 14) are palletized and 11% are co-palletized, while most copies appear to be sacked? Where is it printed?

(f) Please state which of the publications listed in the data are weekly publications with circulations of less than 100,000.

CERTIFICATE OF SERVICE

I hereby certify that on this 4th day of June, 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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