

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

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

) **Docket No. C2004-1**

**FOURTH INTERROGATORIES AND  
REQUESTS FOR PRODUCTION OF DOCUMENTS  
OF AMERICAN BUSINESS MEDIA  
TO TIME WARNER INC., ET AL. WITNESS SCHICK  
ABM/TW et al.-T4-68-69  
(June 10, 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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ABM/TW et al. -T4-68. Assume that there is a publication with a mailed circulation of 120,000 copies and that it is prepared in 70 different demographic versions, ranging in size from 150 copies to 2,500 copies per version. Please discuss the practical (including paperwork) difficulties in comailing or copalletizing that publication and how you would overcome those difficulties.

ABM/TW et al-T4-69. Please address the practical difficulties that would be faced by a short-run printer seeking to comail or copalletize periodicals in standard trim size, tabloid size and digest size. Please address in your response whether these sizes can be combined for purposes of comailing or copalletizing.