

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

COMPLAINT OF TIME WARNER INC. et al.
CONCERNING PERIODICALS RATES

Docket No. C2004-1

**FIRST SET OF DISCOVERY REQUESTS
FROM THE NATIONAL NEWSPAPER ASSOCIATION
To TW-et al. WITNESS GORDON
NNA/TW et al. – T3-1- 13
(June 14, 2004)**

Pursuant to Rules 25 through 28 of the Commission's Rules of Practice, The National Newspaper Association, Inc. submits the following interrogatories to Witness Gordon (TW et al. – T3). If witness Gordon is unable to provide a full response, please provide a response by another witness, employee or representative of Complainants.



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FIRST SET OF DISCOVERY REQUESTS
FROM THE NATIONAL NEWSPAPER ASSOCIATION, Inc.
TO WITNESS GORDON
NNA/TW et al. – T3 – 1-13

NNA/TW et al T3-1 Do you consider the weekly edition of the New York Tribune, established in the 1840s, to have been a nationally circulated newspaper?

NNA/TW et al T3-2 Do you believe Congress established uniform postal rates for magazines in whole or in part to establish a common culture across the American frontier?

NNA/TW et al T3-3 Are you familiar with the Congressional history surrounding the establishment of the free in-county postal rate in the 1840s?

NNA/TW et al T3-4 Do you believe that many of the weekly newspapers still published in America today were established during the period discussed in your testimony on pages 4-5?

NNA/TW et al T3-5 Please refer to your statement on p. 4 lines 17-20 that no newspapers circulated nationally at the beginning of the 20th century. Please explain why you would not consider the Wall Street Journal, the Christian Science Monitor and Capper's Weekly to be nationally-circulated newspapers.

NNA/TW et al T3-6 Do you believe each new medium developed in America has displaced the media that preceded it? For example, did radio make magazines less important to the public? Please explain your response.

NNA/TW et al T3-7 In the progression of the media developments that you describe in your testimony, what technological development would you expect to see that would fulfill the role of providing news of hometowns to distant subscribers, should postal rates force newspapers to cease to fulfill that role themselves?

NNA/TW et al T3-8 Do you believe the Internet will have 100 percent penetration into American households within the next

- a. 3 years?
- b. 5 years?
- c. 10 years?
- d. longer, and if so, how long?

NNA/TW et al T3-9 Do you believe the Internet will displace all magazines within any time frame described in NNA/TW et al T3-8?

NNA/TW et al T3-10 Do you believe the Internet will displace all newspapers within any time frame described in NNA/TW et al T3-8?

NNA/TW et al T3-11 Have you conducted any studies or research or written any articles or books about the economic viability of Internet publications that do not depend upon print media in any way for sharing of fixed costs, sharing of content or sharing or marketing expenses? If so, please provide copies.

NNA/TW et al T3-12 Do you believe the Postal Service has no role in “binding the nation together” with information published in newspapers or magazines

- a. Today?
- b. Next year?
- c. In any time frame described in NNA/TW et al T3-8
- d. Following implementation of any rates adopted as a result of this case?

NNA/TW et al T3-13 If you believe the role of the Postal Service in “binding the nation together” is being diminished or displaced, would you recommend that the Postal Service no longer recognize the value of educational, cultural or scientific information in its rates or policies? Please explain your response.