

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 DISCOVERY REQUEST
DIRECTED BY THE MCGRAW-HILL COMPANIES, INC.
TO COMPLAINANT READERS DIGEST ASSOCIATION, INC.
MH/RD – 1
(June 14, 2004)**

Pursuant to Rules 25 through 28 of the Commission's Rules of Practice, The McGraw-Hill Companies, Inc. submits the following interrogatory to Complainant Readers Digest Association, Inc.

/s/

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MH/RD-1: Referring to your response to Presiding Officer's Information Request No. 1, Question 2:

(a) Please explain fully what you mean by "[i]mprov[ing] system capabilities at the fulfillment house to reduce the number of mailstreams;"

(b) Please explain fully what you mean by "expand[ing] mail-line functionality to reduce postal sacks while simultaneously expanding advertising options," and explain the nature and extent of the capital investments that you contemplate pursuing with printers in order to achieve those ends;

(c) Please explain fully what you mean by "[m]odify[ing] multiple periodical closing schedules ... in order to optimize distribution objectives;"

(d) Please explain fully what you mean by "[a]nalyz[ing] paper basis weight purchasing options to favorably impact dropship incentives."