

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

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COMPLAINT OF TIME WARNER INC. ET AL.  
CONCERNING PERIODICALS RATES

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Docket No. C2004-1

RESPONSES OF AMERICAN BUSINESS MEDIA TO  
TW et al./ABM-1-3, 6, 8-64  
(August 18, 2004)

American Business Media hereby provides the responses to Time Warner Inc., et al.'s Interrogatories and Request for Production of Documents TW et al./ABM-1-3, 6, 8-64, filed July 27, August 4, and August 12, 2004.

The interrogatories are stated verbatim and followed by the response.

Respectfully submitted,

/s/ David R. Straus

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August 18, 2004

## Response of ABM to TW et al./ABM-1

### TW et al./ABM-1:

- a. Please confirm that on the ABM website, location [http://www.americanbusinessmedia.com/member\\_directory/directory.cfm](http://www.americanbusinessmedia.com/member_directory/directory.cfm) contains a list of ABM members, classified as either:
  - (1) associate;
  - (2) educational;
  - (3) international;
  - (4) lifetime;
  - (5) media organization;
  - (6) publisher; or
  - (7) sister member.
- b. Please confirm that the attached table (Table ABMList-1) contains all current ABM members. If not confirmed, please list all current members not included, by member category, and indicate which if any of those listed are not current members.
- c. How does member category affect a member's (1) voting power; and (2) annual dues?
- d. Why is one and only one member listed under the category 'publisher'?
- e. Please indicate which of the listed members are printers who print one or more publications that are mailed under Periodicals rates.
- f. Please indicate which of the listed members publish at least one publication that is mailed under Periodicals rates.
- g. Please indicate which of the listed members publish at least one publication whose editorial contents can be accessed wholly or partially on the internet.
- h. Please provide the address and any internet url(s) of each member.
- i. Please identify each member that is a for-profit company and indicate for each company whether it is privately owned or publicly traded. If publicly traded, please

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identify the exchange on which it is traded and the name or code under which it is listed.

### RESPONSE

a. Confirmed, as of the date of the request. However, since that time, category (6), “publisher,” has been removed, since its inclusion was an error.

b. Confirmed, for members as of May 2, 2004, the most recent American Business Media board meeting prior to the drafting of this response.

c. American Business Media objects to this question on the ground that it is not reasonably calculated to lead to the discovery of admissible evidence.

Notwithstanding this objection, American Business Media provides the following response: (1) Only media organizations, category 5, may vote. (2) Categories 3 and 5, international and media organizations, pay annual dues based upon advertising revenues. Category 1, associate members, pay a fixed annual amount. Category 4, lifetime members, pay a one-time fixed amount. Categories 2 and 7, educational and sister organizations, pay no dues.

d. The listing of one member under the “publisher” category was a data entry error that has since been corrected. That member should have been listed as a media organization.

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e. American Business Media does not collect or maintain information on the specific publications printed by printer members. However, based upon our general knowledge, we believe that the following members are printers that print one or more publications that are mailed at Periodicals rates: American Press, LLC , Banta Publications Group, Brown Printing Company, Cadmus Specialty Publications, Democrat Printing & Lithographing Co., Publishers Press Incorporated, Quad/Graphics, Inc., Quebecor World, RR Donnelley Company.

f. American Business Media does not routinely collect or maintain information on the rates at which member publications are mailed, although based upon our general knowledge we believe that the vast majority of our member publications are mailed at Periodicals rates. To identify the members with at least one publication, please see the American Business Media directory on the American Business Media website, the URL for which is set out in your question TW et al./ABM-1 a. Please note that the members themselves, and not American Business Media, maintain the listing of publications at that website.

g. American Business Media does not routinely collect or maintain information that will permit it to identify members that publish at least one publication whose editorial contents can be accessed in whole or in part on the internet, although based upon our general knowledge, it is our understanding that many of the members with publications maintain such web sites. To further identify such members, please see the American

### **Response of ABM to TW et al./ABM-1**

Business Media directory on the American Business Media website, the URL for which is set out in your question TW et al./ABM-1 a. That directory lists web sites for many member publications, and we believe that examination of those web sites will reveal many instances in which at least some of the editorial content of the publication is available. For example, at that website click “Advanstar” under “Browse Records,” and you will find a listing for that media organization along with a list and description of its publications. Click, for example, the publication Aftermarket Business to move to that publication’s web site, where there is editorial content at least some of which appears to be from the publication.

h. Except for the member-maintained information in the directory on the American Business Media website, the URL for which is set out in your question TW et al./ABM-1 a., American Business Media does not collect or maintain this information. We believe that the directory information is reasonably complete and accurate.

i. American Business Media objects to this question on the ground that it is not reasonably calculated to lead to the discovery of admissible evidence.

Notwithstanding this objection, American Business Media states that does it not collect or maintain this information concerning its members, although based upon general knowledge we do know that some members—such as Primedia, The McGraw-Hill Companies and Penton Media—are publicly traded on the New York Stock Exchange,

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while others, such as Lebhar-Friedman, Inc., Crain Communications, Inc. and Bobit Business Media, are privately owned.

## Response of ABM to TW et al./ABM-1

<b>Table ABMList-1</b>	
<b>Member Name</b>	<b>Member Category</b>
ABRY Partners, LLC	Associate
Accountability Information Management, Inc.	Associate
AdMedia Partners, Inc.	Associate
Affinity Research	Associate
American Press, LLC	Associate
Apprise Media, LLC	Associate
Banta Publications Group	Associate
Bariston Partners, LLC	Associate
Barnstable Broadcasting, Inc.	Associate
Bay Sherman Craig & Goldstein, LLP	Associate
Berkery, Noyes & Co.	Associate
Berkshire Information Systems, Inc.	Associate
BIA Financial Network	Associate
BizViz Internet Analytics, Inc.	Associate
Booz Allen Hamilton	Associate
Boston Ventures Management, Inc.	Associate
Brown Brothers Harriman & Co.	Associate
Brown Printing Company	Associate
Cadmus Specialty Publications	Associate
Chaffee Interactive	Associate
CIT Group, Inc., The	Associate
Citizens Bank of Massachusetts	Associate
Clifford Paper, Inc.	Associate
Computer Fulfillment	Associate
Datasystem Solutions, Inc.	Associate
Datatrax Publishing Systems, Inc.	Associate
Deloitte & Touche LLP	Associate
Democrat Printing & Lithographing Co.	Associate
DeSilva & Phillips, Inc.	Associate
Edith Roman Associates	Associate
Epsilon Management Systems Inc.	Associate
Erdos & Morgan	Associate
ExactTarget	Associate
Factorial Ltd.	Associate
FIND/SVP	Associate
FosteReprints	Associate
freebizmag.com	Associate
GE Capital	Associate
Google, Inc.	Associate
Hallmark Data Systems	Associate
Harris Nesbitt	Associate
Harvey Research, Inc.	Associate
Hitwise	Associate
IMS/The Auditor	Associate

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ISG Solutions	Associate
Javien Digital Payment Solutions	Associate
Jordan, Edmiston Group, Inc., The	Associate
MCG Capital Corporation	Associate
Media Services Group Ltd.,The	Associate
MediaBrains	Associate
Mediamark Research, Inc.	Associate
NewsStand Inc.	Associate
NIA Group, The	Associate
Niall Kavanagh Communications	Associate
Olive Software	Associate
Omeda Communications	Associate
PARS International Corp.	Associate
Perry Judd's Incorporated	Associate
Pfingsten Partners, LLC	Associate
Proximity Marketing	Associate
Publishers Press Incorporated	Associate
Qittitut Consulting LLC	Associate
Quad/Graphics, Inc.	Associate
Quebecor World	Associate
Readex, Inc.	Associate
Reprint Management Services	Associate
RR Donnelley Company	Associate
RSiCopyright	Associate
Sandler Capital Management	Associate
Scher Group	Associate
SearchChannel	Associate
TNS Media Intelligence/ CMR	Associate
Unisfair, Inc.	Associate
Veronis Suhler Stevenson	Associate
W.B. Grimes & Company	Associate
Warburg Pincus	Associate
Wells Fargo Communications Finance	Associate
Whitestone Communications, Inc.	Associate
Zinio Systems, Inc	Associate
Columbia University, Graduate School of Journalism	Educational
Fordham University Graduate School of Business Admin.	Educational
Howard University, School of Communications	Educational
New York University, School of Continuing Ed. Center for Publishing	Educational
Northwestern University, Medill School of Journalism	Educational
Ohio University	Educational
Pace University, MS Publishing Program	Educational
Syracuse University, S.I. Newhouse School of Public Communications	Educational
University Of California, Berkeley, Graduate School of Journalism	Educational

## Response of ABM to TW et al./ABM-1

University of Georgia, College of Journalism and Mass Communication	Educational
University of Missouri at Columbia, School of Journalism	Educational
University of Southern California, Annenberg School for Communication	Educational
Brunico Communications Inc.	International
CCI Asia-Pacific Ltd. (Hong Kong)	International
EMAP Communications Ltd. (UK)	International
Groupe Moniteur	International
Grupo Lund de Editoras Associadas (Brazil)	International
Guangzhou Advertising Co. Ltd.	International
Nikkei Business Publications America, Inc.	International
Rogers Media/Business Information Group	International
VFP Communications LTD	International
Babcock Sr. , John	Lifetime
Hobbs, Gerald S.	Lifetime
Kobak, James B.	Lifetime
Lauinger, Jr., Phillip	Lifetime
Littleford, William D.	Lifetime
McAllister Jr., Donald	Lifetime
Sarbin, Hershel B.	Lifetime
Shore, Douglas	Lifetime
Sparks Jr., Baxter A.	Lifetime
Wickersham, John	Lifetime
101communications	Media Organization
Acoustical Publications Inc.	Media Organization
Advanstar, Inc.	Media Organization
Alexander & Edwards Publishing	Media Organization
Allured Publishing Corporation	Media Organization
American Lawyer Media, Inc.	Media Organization
Ascend Media Inc.	Media Organization
Babcox Publications, Inc.	Media Organization
Ball Publishing	Media Organization
Bev-Al Communications, Inc. dba Adams Beverage Group	Media Organization
Billian Publishing, Inc.	Media Organization
Bloomberg LP	Media Organization
Bobit Business Media	Media Organization
Bond Communications	Media Organization
Boucher Communications	Media Organization
Branch-Smith Publishing	Media Organization
Business Journals, Inc.	Media Organization
Canon Communications LLC	Media Organization
CMP Media LLC	Media Organization
Commonwealth Business Media, Inc.	Media Organization
Compass Publications, Inc.	Media Organization
Conquest Business Media	Media Organization
Country Journal Publishing Company Inc.	Media Organization

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Crain Communications Inc	Media Organization
CSP Information Group, Inc.	Media Organization
Curtis-Straus LLC d/b/a/ Conformity	Media Organization
Dana Chase Publications, Inc.	Media Organization
Deal LLC, The	Media Organization
Dempa Publications, Inc.	Media Organization
Diversified Business Communications	Media Organization
Doane Agricultural Services	Media Organization
Douglas Publications, Inc.	Media Organization
Dowden Health Media, Inc	Media Organization
Edgell Communications	Media Organization
Ehlert Publishing Group, Inc.	Media Organization
Elsevier Inc. /Health Sciences Division	Media Organization
Endurance Business Media	Media Organization
Fairchild Publications	Media Organization
Farm Journal Media	Media Organization
Forbes.com	Media Organization
Front Range Publishing	Media Organization
GCN Publishing	Media Organization
GIE Media, Inc,	Media Organization
Gill Ashton Publishing LLC	Media Organization
Hammock Publishing, Inc.	Media Organization
Hanley Wood, LLC	Media Organization
Hearst Business Media	Media Organization
High Plains Publishers, Inc.	Media Organization
Highline Media LLC	Media Organization
Hoard, WD&Sons	Media Organization
Hoyt Publishing Company	Media Organization
IDG	Media Organization
IEEE Media	Media Organization
Iowa Farmer Today, Inc/ Division of Gazette Comm.	Media Organization
James Informational Media, Inc.	Media Organization
Jobson Publishing Co. LLC	Media Organization
Journalistic, Inc.	Media Organization
Kona Communications, Inc.	Media Organization
Laurin Publications, Inc.	Media Organization
Lebhar-Friedman, Inc.	Media Organization
Lee Agri-Media	Media Organization
Lee Publications	Media Organization
Leisure Publications, Inc.	Media Organization
Macfadden Communications Group, LLC	Media Organization
Marketing & Technology Group	Media Organization
MC Publishing	Media Organization
McGraw-Hill Companies, The	Media Organization
Media Ventures, Inc.	Media Organization
Mediabistro.com, Inc.	Media Organization
MediaTec Publishing, Inc.	Media Organization

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Meister Media Worldwide	Media Organization
Mercor Media	Media Organization
Metal Bulletin plc	Media Organization
Metal Finishing	Media Organization
Multimedia Healthcare/Freedom, LLC	Media Organization
National Association for the Specialty Food Trade, Inc.	Media Organization
National Trade Publications, Inc.	Media Organization
Network Communications Inc. /Black's Guide	Media Organization
Newport Communications Group	Media Organization
North American Publishing Company	Media Organization
Northstar Travel Media LLC	Media Organization
Octagon Communications Corp.	Media Organization
PennWell Corporation	Media Organization
Penton Media, Inc.	Media Organization
Pfingsten Publishing, LLC	Media Organization
Post Newsweek Tech Media Group	Media Organization
Preston Publications	Media Organization
Primedia Business Magazines & Media	Media Organization
Professional Media Group, LLC	Media Organization
Progressive Farmer	Media Organization
Putman Media	Media Organization
Quadrant Media Corporation	Media Organization
Randall Publishing	Media Organization
Red 7 Media, Inc.	Media Organization
Reed Business Information	Media Organization
Scholastic, Inc.	Media Organization
Simmons-Boardman Publishing Corp.	Media Organization
SmartBrief	Media Organization
Society for Human Resource Management (SHRM)	Media Organization
Sosland Publishing Co.	Media Organization
SRDS	Media Organization
ST Media Group International Inc.	Media Organization
Stamats Business Media	Media Organization
Successful Farming	Media Organization
Summit Publishing Company	Media Organization
The Magazine Group	Media Organization
Thomas Publishing Company	Media Organization
Thomson Media	Media Organization
Trade Press Publishing Corp.	Media Organization
Trend Publishing Inc.	Media Organization
United Publications	Media Organization
Vance Publishing Corporation	Media Organization
VNU Business Media	Media Organization
Watt Publishing Company	Media Organization
Wicks Business Information LLC	Media Organization
Williams Publications Company, E. W.	Media Organization
Witter Publishing Corporation	Media Organization

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Ziff Davis Media, Inc.	Media Organization
Lippincott Williams & Wilkins/ Wolters Kluwer	Publisher
Advertising Research Foundation (ARF)	Sister Member
American Advertising Federation	Sister Member
American Association of Advertising Agencies (AAAA)	Sister Member
Association of National Advertisers, Inc (ANA)	Sister Member
Audit Bureau of Circulations (ABC)	Sister Member
BPA International	Sister Member
Business Marketing Association	Sister Member
Direct Marketing Association (DMA)	Sister Member
Society of Independent Show Organizers	Sister Member

## **Response of ABM to TW et al./ABM-2**

### **TW et al./ABM-2:**

Please review the list of publications in the attached Table ABMList-2 and confirm that they are published by ABM members or their affiliates (hereafter, "ABM-member publications"). If not confirmed, please identify those that are not published by ABM members or their affiliates. Please also identify all publications by ABM members or their affiliates that are not shown in the table, including any publications by ABM members or their affiliates that are published electronically only, hardcopy publications that are distributed by the Postal Service but not under Periodicals rates, and hardcopy publications that are distributed outside of the U.S. Postal Service.

### **Response**

The list of publications to which reference is made appears to contain publications produced by American Business Media members. This list, which we understand is the same list used by American Business Media in certain interrogatories to Time Warner et al. witness Gordon, rearranged in alphabetical order, was obtained from American Business Media's directory, which is updated by the members themselves. Therefore, although American Business Media believes it to be accurate, we cannot state with absolute certainty that every publication on that list is in fact published by an American Business Media member. American Business Media does not collect or maintain a list of publications not on that list that are produced by its members or their affiliates, although we are aware that some of our members, such as Primedia Business Magazines and Media and Hearst Business Media, are affiliated with publishers of consumer magazines that are not members of American Business Media and that are not listed in our directory or on that list.

## Response of ABM to TW et al./ABM-2

<b>Table ABMList2: ABM Publications</b>	
1up.com	20/20
411 Publishing	AA News
ABA Banking Journal	ABOS Maine Blue Book
Abstracts in Hematology & Oncology	Academic Medicine
Academic Physician & Scientist	Access Control & Security Systems
Accessories	Accessory Merchandising
Accounting Technology	Accounting Technology First Look
Accounting Today	Accounting Today First Look
Ad Age's Creativity	Addiction Medicine
Advanced Packaging	Advances in Anatomic Pathology
Advertising Age	Adweek
Aerospace Daily & Defense Report	AF Lewis
Affordable Housing Finance magazine	Aftermarket Business
Ag Lender	Ag Retailer
aggman.com	Aggregates Manager
Agri Marketing	Agri-View
AIDS Alzheimer Disease & Related Research	AIDS Reader
Air Cargo World	Air Transport World
Aircraft Blue Book Digest	Airplay Monitor
Alaska Fisherman's Journal	Alexander Hamilton Awards & Conference
Alternative Investor	Am Law Tech
American Acreage	American Agent & Broker
American Artist	American Banker
American Banker Online	American City & County
American Coin-Op	American Demographics
American Drycleaner	American Fruit Grower
American Heart Journal	American Journal of Cardiology
American Journal of Clinical Oncology	American Journal of Dermatopathology
American Journal of Forensic Medicine & Pathology	American Journal of Gastroenterology
American Journal of Hypertension	American Journal of Medicine
American Journal of Obstetrics and Gynecology	American Journal of Ophthalmology
American Journal of Orthopedics	American Journal of Preventive Medicine
American Journal of Surgery	American Journal of Surgical Pathology
American Journal of Therapeutics	American Laundry News
American Lawyer, The	American Machinist
American Painting Contractor	American Printer
American Salon	American School & University
American Spa	American Trucker
American Vegetable Grower	America's Network
AMM	Amusement Business
Annals of Emergency Medicine	Annals of Long-Term Care
Annals of Plastic Surgery	Annals of Surgery
Annals of Thoracic Surgery	Annuity Market News
Anti-Cancer Drugs	Apartment Finance Today magazine
Apparel Magazine	Apparel Merchandising
Appliance	Application Development Trends
Applied Clinical Trials	Applied Immunohistochemistry
Apply	Aquatics International

## Response of ABM to TW et al./ABM-2

Archery Business	Architectural Lighting
Architectural Record	Architecture
Art Business News	Art Miami Show
ArtExpo Show	ASA Meeting Dailies
ASA/ASPN Refresher Courses	Asset Securitization Directory
Asset Securitization Report	Association Meeting & Event Planners
Association Meetings	ATM&Debit News
ATW Daily News	ATW's Equipment & Technology
ATWOnline	Auto Laundry News
Auto Rental News	Auto Trim & Restyling News
Automobilwoche	Automotive & Aerospace Test Reports
Automotive Body Repair News	Automotive Fleet
Automotive News	AutoWeek
Aviation Daily	Aviation Week & Space Technology
Back Stage	Back Stage West
Bakery Production & Marketing Newsletter	Baking & Snack
Baking Buyer	Baking Management
BakingBusiness.com	Bank Investment Consultant
Bank Loan Report	Bank Systems & Technology
Bank Technology News Bulletin	Base Station/Earth Station
Baseline	Baslinemag.com
Beef	Beef Today
Behavioral Pharmacology	Benefit News Connect
BenefitNews Adviser	BenefitNews.com
Better Roads	Beverage Aisle
Beverage Dynamics	Beverage Spectrum Magazine
Beverage World	Big Builder
Big Picture, The	Billboard
Bio-IT World	BioMechanics Magazine
BioPharm International	Bioscience Technology
Black's Guide	Blood Coagulation & Fibrinolysis
Blood Pressure Monitoring	Bloomberg Markets
Bloomberg Wealth Manager	BMJ USA
Boat & Motor Dealer	Boating Industry
BodyShop Business	Bond Buyer, The
Bookseller, The	BookTech the Magazine
Bovine Veterinarian	BPM Strategies (conference)
Brake & Front End	Brandweek
Bridge Builder	bridgebuildermagazine.com
Broadband Week	Broadcast Engineering U.S./Canada & World Editions
Broadcasting & Cable	Broker
Broker Universe	BtoB
BtoB Media Business	Buildcore Suite of Products (Reed Construction Data)
Builder	Building Design & Construction
Building Operating Management	Building Products
Buildings	Buildings Interiors
Buildings.com	BusCon (trade show)
Business & Commercial Aviation	Business 4Site
Business Driver	Business Finance

## Response of ABM to TW et al./ABM-2

Business Fleet	Business Forms, Labels & Systems
Business Insurance	Business Performance Management
Business Publication Advertising Source	Business Travel News
Business Travel Planner	BusinessWeek
BusinessWeek Online	C/C++ User's Journal
Cabling Installation & Maintenance	CADalyst
CADENCE	Cadence Magazine
California Builder & Engineer – (Reed Construction Data)	California Construction Link
Call Center Magazine	CanaData Construction Forecasting – (Reed Construction Data)
CanaData Construction Starts (Reed Construction Data)	Canadian Sailings
Cancer Genetics and Cytogenetics	Candy Buyers' Directory
Car & Locomotive Yearbook	Car Rental Show
Card Industry Directory	Card Source One
Card Technology	CardForum
Cardiology in Review	CardLine
CardUpdate	Career Adviser
Caring Daily	Caring for the Aged
Casino Executive	Casino Journal
Casual Living	Catalog Age
Catalog Success	CD Only
CE News	CED
cenews.com	CEQ
CertCities.com	Certification Magazine
Chain Leader	Chain Store Age
ChannelZone (Web site)	Cheers
Chemical Equipment	Chemical Processing
CI World Report	CIO
CIO Insight	Cioinsight.com
Circulation 2004	Circulation Management
Citrus & Vegetable Magazine	Claims
Clark Reports (Reed Construction Data)	Cleanfax
Cleaning & Maintenance Management	Cleanlink.com
CleanRooms	CleanTech
Clearing Quarterly & Directory	Clinical Biochemistry
Clinical Dysmorphology	Clinical Geriatrics
Clinical Journal of Pain	Clinical Journal of Sport Medicine
Clinical Neuromuscular Disease	Clinical Neuropharmacology
Clinical Nuclear Medicine	Clinical Obstetrics & Gynecology
Clinical Psychiatry News	Clinical Pulmonary Medicine
Clinical Trials Reporter	Clinician News
Clinician Reviews	Closets
Club Industry	CMEPlanner.com
CMExpo (trade show)	Collections & Credit Risk
Collections Source 1	College Adviser
Colorado Construction	Commercial Carrier Journal
Commercial Christmas Decor	Commercial Dealer
Commercial Fisheries News	Commercial Property News
Communication Systems Design-CSD	Communications Convergence

## Response of ABM to TW et al./ABM-2

Community Publication Advertising Source	CompensationPro
Compliance Engineering Magazine	Compliance Magazine
Computer Gaming World	Computer Graphics World
Computer Society - Computer	Computerworld
Concrete & Masonry Construction Products	Concrete Construction
Concrete Producer, The	Concrete Products
Conference Insights	Conference of Automotive Remarketing
Conformity	Connected Home Media
Connecticut Law Tribune	Connector Specifier
Construction & Demolition Recycling	Construction (Reed Construction Data)
Construction Bulletin (Reed Construction Data)	Construction Digest (Reed Construction Data)
Construction Equipment	Construction News (Reed Construction Data)
Construction News West	Construction.com
Constructioneer (Reed Construction Data)	Consultant
Consultant for Pediatricians	Consulting Insights
Consulting-Specifying Engineer	Consumer Goods Technology
Consumer Magazine Advertising Source	Contact Lens Spectrum
Contemporary OB/GYN	Contemporary Pediatrics
Contemporary Surgery	Contemporary Urology
Contingency Planning & Management	Contract
Contracting Business	Contracting Profits
Contractor	Contractor Tools & Supplies
Control	Control Design
Control Engineering	Control Solutions
Controlled Clinical Trials	Convenience Store Decisions
Convenience Store News	Converting Magazine
Corn and Soybean Digest, The	Cornea
Cornell Hotel & Restaurant Administration Quarterly	Corporate Choices
Corporate Counsel	Corporate Dealmaker
Corporate Gift Buyers	Corporate Library Update
Corporate Meeting & Event Planners	Corporate Meetings & Incentives
Corporate Syndicate Personnel Directory	Cosmetic Dermatology
Cosmetic Surgery Times	Cosmetic/Personal Care Packaging
Cosmetics & Toiletries	Cotton Farming Management
Cotton Grower	Counterman
Country Folks	Country Folks Grower
Crain's Chicago Business	Crain's Cleveland Business
Crain's Detroit Business	Crain's New York Business
Crane Works	Creative Handbook
Credit & Collections World Online	Credit Card Management
Credit Union Journal Daily Briefing, The	Credit Union Journal, The
Criticas Magazine	CRN
Crop Decisions	Crop Protection Handbook
CropLife	CropLife Iron
CSI's MANU-SPEC (Reed Construction Data)	CSI's SPEC-DATA (Reed Construction Data)
CSO	CSP (Convenience Store/Petroleum) Magazine
CSP Daily News	Current Opinion in Allergy and Clinical Immunology
Current Opinion in Clinical Nutrition & Metabolic Care	Current Opinion in Gastroenterology
Current Opinion in Hematology	Current Opinion in Infectious Diseases

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Current Opinion in Lipidology	Current Opinion in Nephrology & Hypertension
Current Opinion in Neurology	Current Opinion in OB & GYN
Current Opinion in Oncology	Current Opinion in Ophthalmology
Current Opinion in Organ Transplantation	Current Opinion in Orthopaedics
Current Opinion in Otolaryngology & Head Neck Surgery	Current Opinion in Pediatrics
Current Opinion in Psychiatry	Current Opinion in Pulmonary Medicine
Current Opinion in Rheumatology	Current Opinion in Urology
Current Psychiatry	Custom Conference Group
CU.S.tom Home	Custom HoU.S.e Outdoors
CU.S.tom publishing	Custom publishing
CU.S.tom Woodworking Business	CustomRetailer
Cutis	Cutting Technology
D&O Advisor	Daily Business Reviews
Daily Commercial News (Reed Construction Data)	Daily Journal, The
Daily Pacific Builder	Daily Variety
Dairy Herd Management	Dairy Today
dataWarehouse.com	DB2 Magazine
Deal, The	Dealer & Applicator
Dealernews	Dealerscope
Décor	Décor Expo
Delaware Law Weekly	Delicious Living
Delta Farm Press	Dental Economics
Dental Equipment & Materials	Dental Lab Products
Dental Practice Report	Dental Products Report
Dermatology Times	Design News
Design-Build	Diagnostic Imaging
Diagnostic Imaging SCAN	Diagnostic Molecular Pathology
Direct	Direct Marketing List Source
Directory of M&A Intermediaries	Directory of U.S. Exporters
Directory of U.S. Importers	Display & Design Ideas
Display Devices	District Administration
Diversion	Dixie Contractor (Reed Construction Data)
DM Direct Newsletter	DM Direct Special Report
DM Review	DMReview.com
DNR	Dodge Bulletins
Dodge Construction News Green Sheet	Dodge Daily & Weekly Bulletins
Dr. Dobb's Journal	Drivers
Drovers Magazine	Drug Benefit Trends
Drug Discovery & Development	Drug Store News
Drug Topics	DSN Retailing Today
DV (Digital Video) Magazine	DVD Exclusive
DVM Newsmagazine	EBN Benefits SourceBook
EC&M Books	ECN
Ecological Complexity	Editor & Publisher
EDN	EE Product News
EE Times	EEM/Electronic Engineers Master
E-Gear	Egg Industry
E-Gov Institute	e-Handbook
EITD (Electronic Industry Telephone Directory)	EJ of Emergency Medicine
Electric Light & Power	Electrical Construction Maintenance

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Electrical Marketing	Electrical Wholesaling
Electronic Business	Electronic Design
Electronic Gaming Monthly	Electronic Musician
Electronic News	Electronic Pesticide Dictionary 2003
Electronic Products	Electronic Publishing
Electronics Buyers' Guide	Electronics Source Book
Electronics Supply & Manufacturing	EMB (Embroidery/Monogram Business Magazine)
Embedded Computing Solutions	Embedded Systems Programming
Emergency Medicine	Emergency Medicine News
Employee Benefit News	Endocrinologist, The
Engine Builder	ENR
ENT	Entertainment
Entertainment Design	Epidemiology
e-Pro Magazine	Equipment Catalog
Equipment Connection	Equipment World
EquipmentWatch	eSeminar
etrucker.com	European Journal of Cancer Prevention
European Journal of Gastro Hepatology	European Medical Device Manufacturer
Event Marketer	Evidence Based Eye Care
Evidence Based Gastroenterology	eWEEK
eweek.com	Executive Technology
Executives	Exhibit & Trade Show Display Buyers
Expansion Management	Experimental Hematology
EXPO	ExtremeTech.com
Eyecare Business	F&I Management & Technology
Facets	FacilityCare
Family Health Matters	Family Practice News
Farm & Ranch Guide	Farm Industry News
Farm Journal	Fast Finder
Federal Computer Week	Federal Practitioner
Feed Management	Female Patient, The
FEPN (Fire/EMS Product News)	Fertility & Sterility
Fertilizer Technology and Application	Fiberoptic Product News
Field Force Automation	Financial Planning
Financial Professional's Diary & Guide	Fire Chief
Fire Engineering	FireEMS
FireRescue Magazine	First Source (Reed Construction Data)
First Source CAD (Reed Construction Data)	First Source Suite of Products (Reed Construction Data)
FirstsourceONL.com (Reed Construction Data)	Fish Farming News
Fitness Management	Fitness Management YMCA Edition
Fitness OnSite	Fleet Association Directory
Fleet Expo	Fleet Financials
Fleet Owner	Floor Covering Weekly
Flooring	Florida Grower
Florida Lawyer	Florida Shipper, The
Florida Underwriter	Flow Control
Focus Europe	Folio
Food and Feed Crops of the United States	Food Creations
Food Engineering & Ingredients	Food Management
Food Manufacturing	Food Processing

## Response of ABM to TW et al./ABM-2

FoodService Director	Foodservice Equipment & Supplies
Foodservice Equipment Reports	Footwear News
Forging	Formulary
Forwarder's List of Attorneys	FOSE
FOSE.com	Foundry Management & Technology
Frames Quarterly	Framing Business News
Free Radical Biology & Medicine	Front Range Business
Frontline Solutions	Fulton County Daily Report
Functional Foods & Nutraceuticals	Fund of Funds Conference, New York
Furniture Style	Furniture/Today
Galileo's World	Game Developer
Game Pro	GameNow
Gaming Industry News	Garden Center Merchandising & Management
Garden Center Products & Supplies	Garden Décor
Gas Utility Manager	Gases & Welding Distributor
Gastroenterology	GCN Internet Seminar Series
GCN.com	Genomics & Proteomics
Geospatial Solutions	Geriatric Times
Geriatrics	Gift, Housewares & Home Textile Buyers
Gifts & Decorative Accessories	Glaucoma
Global Cosmetic Industry	Golf Course News
Golfdom	gostructural.com
Gourmet Retailer, The	Government CIO Summit (conference)
Government Computer News	Government PROcurement
Government Product News	Government Security
GPS World	Grain Journal
Graphic Arts Blue Books	Graphic Arts Monthly
Graphic Design Business	Great American Trucking Show, The
Green Profit	Green Sheet (Reed Construction Data)
Greenbook Crop Protection Reference Manual	Greenbook MSDS Manual
Greenbook Turf and Ornamental Protection Manual	Greenhouse Grower
Greenhouse Management & Production	Greensheet Logger (Reed Construction Data)
Greetings etc.	Grocery Headquarters
Grounds Maintenance	Grower Talks
Grower, The	Gulf Shipper
Hard Hat News	Hay & Forage Grower
HDMA/Mortgage Originator Database	Health Data Management Weekly
Health IT World	Health IT World News
Health Market Data (Reed Construction Data)	Healthcare Enterprise
Healthcare Informatics	Hearing Journal
Hearing Journal Dailies	Heart Disease Journal of Cardiac Medicine
Heavy Construction	Heavy Duty Trucking
HFN (Home Furnishings News)	High Plains Journal
High Yield Report	Hispanic Media and Market Source
HME Excellence Award Program	HME News Magazine
Hoards Dairyman	Hollywood Reporter, The
Home Accents Today	Home Channel News
Home Decor Buyer	Home Equity Wire
Home Textiles Today	HomeCare
Homeland First Response	Homeland Response
Homeland Security & Defense	Homes & Land Magazine

## Response of ABM to TW et al./ABM-2

Hospital Phone Book	Hospitality Design
Hospitality Profiles (Reed Construction Data)	Hospitality Technology
Hotel & Motel Management	Hotel & Travel Index
HOTELS	HOTELS' Investment Outlook
Housekeeping Solutions	HousingZone.com
HPAC Engineering	HR Magazine
HT - Healthcare Traveler	Human Capital
Human Pathology	HVACR Distribution Business
Hydraulics & Pneumatics	ID Newswire
ID Sales Pro	IEEE Spectrum (Microwave/Power & Energy/Signal Processing)
ImportCar	Impressions
Incentive	Indian Gaming Business
Industrial Distribution	Industrial Equipment News
Industrial Laser Solutions	Industrial Maintenance & Plant Operation
Industrial Networking	Industrial Product Bulletin
Industrial WaterWorld	IndustryWeek
Infections in Medicine	Infections in Urology
Infectious Diseases in Clinical Practice	InformationWeek
InfoStor	InfoWorld
InFurniture	Injection Molding Magazine
In-Plant Graphics	Insect and Disease Control Guide
Inside Direct Mail	In-Stat/MDR
Instructor	Instructor New Teacher
Instrumentation & Automation News	Insurance & Technology
Insurance Conference Planner	Insurance Networking News
Insurance Phone Book	Intelligent Enterprise
Intelliguide by Weissman	Interactive Advertising Source
Interior Business	Interior Decorators' Handbook
Interior Design	Intermountain Contractor
Internal Medicine News	International Aids Clinic
International Clinical Psychopharmacology	International Gaming & Wagering Business
International Journal of MS Care	International Journal of Radiation Oncology Biology Physics
International Journal of Rehabilitation Research	International Ophthalmology Clinics
Internet Publishing Insights Newsletter	Investigative Radiology
Investment Advisor	Investment Advisor Press
Investment Advisor Wealth Advisor Summit	Investment Dealers' Digest
Investment Management Weekly	Investment News
Iowa Farmer Today	IP Law & Business
Irrigation Business & Technology	iSeries NEWS
Israel Diamonds	IT Compliance Institute
IVD Technology	JCK (Jewelers' Circular Keystone)
JEMS (Journal of Emergency Medical Services)	Job board for media industries professionals
Journal Midwifery and Women's Health	Journal of Adolescent Health
Journal of Aids	Journal of Allergy & Immunology
Journal of Analytical Toxicology	Journal of Bronchology
Journal of Cardiovascular Pharmacology	Journal of Cardiovascular Risk
Journal of Cataract and Refractive Surgery	Journal of Chromatographic Science
Journal of Clinical Anesthesia	Journal of Clinical Gastroenterology
Journal of Clinical Psychopharmacology	Journal of Clinical Rheumatology

## Response of ABM to TW et al./ABM-2

Journal of Commerce (Reed Construction Data)	Journal of Commerce, The
Journal of Computer Assisted Tomography	Journal of Craniofacial Surgery
Journal of Critical Illness	Journal of Critical Pathways in Cardiology
Journal of Diabetes and its Complications	Journal of ECT, The
Journal of Emergency Medicine	Journal of Essential Oil Research
Journal of Family Practice	Journal of Gastrointestinal Surgery
Journal of Gender-Specific Medicine, The	Journal of GXP Compliance
Journal of Heart and Lung Transplantation	Journal of Home Care Medicine, The
Journal of Hypertension	Journal of Immunotherapy
Journal of Light Construction, The	Journal of Medical Microbiology
Journal of Musculoskeletal Medicine	Journal of Nerve & Mental Disease
Journal of Neurosurgical Anesthesiology	Journal of Orthopaedic Trauma
Journal of Pain and Symptom Management	Journal of Pediatric Gastroenterology
Journal of Pediatric Orthopaedics Part B	Journal of Pediatrics
Journal of Pelvic Surgery	Journal of Psychiatric Practice
Journal of Respiratory Diseases	Journal of Tax Credit Investing
Journal of the American Academy of Dermatology	Journal of the American Academy of Physician Assistants (JAAPA)
Journal of the American College of Cardiology	Journal of the American College of Surgeons
Journal of the American Society for Mass Spectrometry	Journal of the Electronics Industry
Journal of the Society of Gynecologic Investigation	Journal of Thoracic Imaging
Journal of Validation Technology	Journal of Women's Imaging
KeyPRODUCTS (Reed Construction Data)	Kids Today
Kiosk Business	Kirkus Reviews
Kitchen & Bath Business	Kosher Today
L Magazine	Laboratory Equipment
Lancet, The	Landscape Design/Build
Landscape Management	Laser Focus World
Laser Focus World's Buyer's Guide	Law Firm, Inc.
Law Technology News	Lawn & Landscape
Lawn & Landscape Weed & Insect Management Summit	LC GC North America
LCT Leadership Summit (conference)	LD1- Entertainment Technology Show
LDB Interior Textiles	Learning and Training Innovations
Leather Today	Legal Times
LH - Lodging Hospitality	Library Hotline
Library Journal	License!
Life Insurance Selling	Life Sciences
Lift Equipment	Lifting & Transportation International
liftlink.com	Lighting Dimensions
Lightwave	Limited Partners Summit
Limousine & Chauffeured Transportation	Limousine & Chauffeured Transportation Show
Logistics Management	Logistics Today
Lottery Business	Louisiana Contractor
LP/Gas	Luxury Home Builder
Luxury International	m10Report
Machine Design	Macworld
Magnetic Resonance Imaging	Maintenance Solutions
Managed Healthcare Executive	Managing Automation
Manufacturer Catalogs (Reed Construction Data)	Manufacturer, The

## Response of ABM to TW et al./ABM-2

Manufacturing Confectioner	Manufacturing Solutions
MAR Reports	MAR Sophisticated Strategies
MARHedge	Marina Dock Age
Marine Log	Marine Log & Maritime Services Directory
Marine Marketing	Market Link (Reed Construction Data)
MarketCast	MarketFAX
Masonry Construction	Mass Merchandise & Off-Price Apparel Buyers
Material Handling Management	Material Handling Product News
Materials Characterization	Mayo Clinic Proceedings
MCP TechMentor Conferences	Meat & Seafood Merchandising (Meats & Provisions)
Meat Marketing & Technology	Meat Processing North American Edition
MEAT&POULTRY	MEATPOULTRY.COM
Mediaweek	Medical Care
Medical Design News	Medical Design Technology
Medical Device & Diagnostic Industry	Medical Device Register
Medical Dosimetry	Medical Economics
Medical Electronics Manufacturing	Medical Meeting Planners
Medical Meetings	Medical Product Manufacturing News
Medicine	Meeting News
Meetings & Conventions	Meetings East
Meetings South	Meetings West
MeetingsFocus.com	Melanoma Research
Men's & Boys' Wear Buyers	Mergers & Acquisitions Database
Mergers & Acquisitions, The DealMaker's Journal	Mergers & Acquisitions Report
Metal Finishing	Metal Finishing Guidebook Dir.
Metal Finishing Organic Guidebook Dir.	Metal Producing & Processing
Metro	Michigan Contractor and Builder (Reed Construction Data)
MICRO Magazine	Microlithography World
Microprocessor Report	Microsoft Certified Professional Magazine
MicroTec Magazine	Microwave Product Digest
Microwaves & RF	Mid-Atlantic Construction
Midwest Construction	Midwest Contractor (Reed Construction Data )
Midwest Marketer	Midwest Messenger
Military & Aerospace Electronics	Millimeter
Milling & Baking News	Milling Journal
Mine & Quarry Trader	Minnesota Farm Guide
Minority Law Journal, The	Mix
Mobile Electronics	Mobile Radio Technology
Mobility Management	Modern Baking
Modern Brewery Age	Modern Brewery Age/Blue Book
Modern Brewery Age/Tabloid Edition	Modern Bulk Transporter
Modern Health for Women	Modern Healthcare
Modern Materials Handling	Modern Materials Handling
Modern Metals	Modern Physician
Modern Plastics	Modern Salon
Modern Tire Dealer	Modern Uniforms
Modern Woodworking	Modernwoodworking.com
Molecular Imaging & Biology	Money Management Executive
MortgageOriginator	Mortgage Broker Database
Mortgage Servicing News	Mortgage Technology

## Response of ABM to TW et al./ABM-2

Mortgage-Custom Data Searches	Motion Control
Motion System Design	Motion System Field Guide
Motion Systems Integrator	Motor
Motor Age	Motor Media
MR	MRO
MRO Today	MSDN Magazine
MSI	Multichannel News
Multifamily Executive	Multi-Housing News
Musical America International Directory of Performing Arts	Mutual Fund Service Guide, The
MX: Business Strategies for Medical Technology	myBusiness
Nails	NASCAR Performance
National Facility Management & Technology	National Fisherman
National Gaming Summary	National Hog Farmer
National Jeweler	National Mortgage News
National Mortgage News Daily Briefing	National Real Estate Investor
National Referral Roster	National Underwriter – Life/Health Edition
National Underwriter – Property/Casualty Edition	Nation's Restaurant News
Natural Foods Merchandiser	Natural Grocery Buyer
Natural Products	NCDM
NetDefense	Network Computing
Network Magazine	Network World
Neurologist, The	Neurology Meeting Reporters
Neurology Reviews	Neurology Today
Neuropsychiatry	NeuroReport
Neurosurgery Quarterly	Neurotoxicology & Teratology
New England Construction (Reed Construction Data)	New Equipment Digest
New Jersey Law Journal	New York Construction News
New York Diamonds	New York Law Journal
Newport's RoadStar	Newspaper Advertising Source
North American Quarry News	Northwest Construction
Nuclear Medicine Communications	Nursery Management & Production
Nursing Home Economics	Nutrition
Nutrition Business Journal	Nutrition Research
Nutritional Outlook	Ob Gyn News
OBG Management	Obstetric & Gynecological Survey
Occupational Hazards	Ocean Oil Weekly Report
Office Equipment & Products	Office Technology
Official Board Markets	Official Cruise Guide
Official Export Guide	Official Hotel Guide International
Official Meeting Facilities Guide	Official Railway Equipment Register
Official Railway Guide	Offshore Magazine
Oil & Gas Financial Journal	Oil & Gas Journal
Oil, Gas & Petrochem Equipment	On Wall Street
Oncology	Oncology Times
onlinemariner.com	Operations & Fulfillment
Ophthalmology	Ophthalmology Management
Ophthalmology Times	Optimize
Optoelectronics Manufacturing	Optometric Management
Organic Products	Origination News

## Response of ABM to TW et al./ABM-2

Ornamental Outlook	Otolaryngology- Head & Neck Surgery
Out-of-Home Advertising Source	Overdrive Magazine
Overhaul & Maintenance	Owner Operator/Company Driver Magazine
Pacific Builder and Engineer (Reed Construction Data)	Pacific Shipper
Pacific Shipper's Transportation Services Directory (annual)	Package Printing
Packaging Digest	Packaging World
Packer, The (Produce)	Pain
PANAmericano.com	Pancreas
Paper, Film & Foil Converter	Paperboard Packaging
Pathology Case Reviews	Patient Care
PC World	PCT Commercial Pest Management Summit
PDR Monthly Prescribing Guide	Peanut Grower, The
Pediatric Case Reviews	Pediatric Emergency Care
Pediatric Hematology Oncology	Pediatric Infectious Disease Journal
Pediatric Neurology	Pediatric News
Pennsylvania Law Weekly	Pensions & Investments
Peptides	Perfumer & Flavorist
Pest Control	Pest Control Technology (PCT)
Pet Business	Petfood Industry
Pharmaceutical & Medical Packaging News	Pharmaceutical Executive
Pharmaceutical Manufacturing	Pharmaceutical Processing
Pharmaceutical Representative	Pharmaceutical Technology North America
Pharmacogenetics	PharmaGenomics
Photo District News	Photo Techniques
Photonics Spectra	Physician & Sportsmedicine, The
Physicians Travel & Meeting Guide	Pit & Quarry
Pizza Today	Plan Rooms (Reed Construction Data)
Planners Weekly	Plans Direct CD-ROM (Reed Construction Data)
Plans Direct Print (Reed Construction Data)	Plant Engineering
Plant Services	Plants Sites & Parks
Plastics Machinery & Auxiliaries	Plastics News
Plate	Playthings
Pocket List of Railroad Officials, The	Point of Care Testing
Police	Pool & Spa News
P-O-P Design	P-O-P Times
Pork	Portable Design
Post	Postgraduate Medicine
Potentials	Poultry
Powder/Bulk Solids	Power
Power Electronics Technology	PowerSports Business
PowerSystems World	Practical Accountant
Practical Accountant First Look	PrecisionAg Buyer's Guide
Premier Hotels & Resorts	Premier Romance
Premier Spas	Premium, Incentive & Travel Buyers
Presentations	Presenting Communications
Primary Care Case Reviews	Primedia Price Digests
Print Media Production Source	Printing Impressions
Printing Impressions Top Management News	Printmarketplace.com
PrintMedia	Private Equity Analyst

## Response of ABM to TW et al./ABM-2

Private Equity Analyst Conference, New York	Private Equity Outlook, New York
Private Label	Private Label Directory
Private Placement Letter	Problems in General Surgery
Process	Processing
Produce Concepts (Produce)	Produce Merchandising (Produce)
Product Design and Development	Production Technology News
Productivity	Professional Builder
Professional Carwashing & Detailing	Professional Jeweler
Professional Remodeler	ProFile: The Architects Sourcebook (Reed Construction Data)
Profitable Embroiderer	Progressive Distributor
Progressive Farmer	Progressive Grocer
Progressive Railroading	Progressiverailroading.com
Promo	Promotional Marketing
Proofs	ProSales
Psychiatric Genetics	Psychiatric Times
Public Works	Publishers Weekly
Publishing	Pulmonary Reviews
Pumps & Systems Magazine	Purchasing
QA (Quality Assurance & Food Safety)	QSR
Quarterly Data Report	R&D Research & Development
Radio Advertising Source	Radio Magazine
Radiologist, The	Railway Age
Railway Track and Structures	RCR Wireless News
RDH	Recharger Magazine
Recharger World Expo (trade show)	Recycling Today
Recycling Today Paper Recycling Conference & Trade Show	Red Book Credit Services
Red Book, The	Reed Bulletin (Canada) (Reed Construction Data)
Reed Bulletin (Reed Construction Data)	Reed Connect (Reed Construction Data)
Reed Construction Data	Reed Press
ReedBulletin.com (Reed Construction Data)	Refrigerated Transporter
Registered Rep.	Religious Conference Manager
Remix	Remodeling
Renew	Replacement Contractor
RER (Rental Equipment Register)	Residential Architect
Residential Construction	Residential Lighting
Residents' Forum (bi-monthly newsletter)	Respiratory Reviews
Response	Restaurant Business
Restaurant Hospitality	Restaurants and Institutions
Restaurants and Institutions Marketplace	Retail Info Systems News
Retail Merchandiser	Retail Traffic, formerly Shopping Center World
Retina	Review of Ophthalmology
Review of Optometry	Reviews in Medical Microbiology
RF Design	Rheumatology News
Rice Farming	RN & WPL Encyclopedia
RN CareerSearch	RN Magazine
Road King	Robotics World
Rock Products	Rocky Mountain Construction (Reed Construction Data)
Ross Reports/ Television & Film	RSI-Roofing/Siding/Insulation

## Response of ABM to TW et al./ABM-2

RSMeans Cost Books (Reed Construction Data)	RSMeans Insurance Services (Reed Construction Data)
RSMeans Reference Books (Reed Construction Data)	RSMeans Research Services (Reed Construction Data)
RSMeans Seminars/Training (Reed Construction Data)	Rubber & Plastics News
S&VC/Sound & Video Contractor	Safety Incentive Buyers
Sales & Marketing Management	Sales & Marketing Strategies and News
Salon Today	Sanitary Maintenance
Scholastic Administr@tor	Scholastic Coach and Athletic Director
Scholastic Early Childhood Today	Scholastic Technology Guide
School Bus Fleet	School Library Journal
Scientific Computing & Instrumentation	Screen Printing
Sea Technology	SeaFood Business
SeaFood Handbook	Securities Industry News
Securities Industry News Midweek News Update	Security Growth Conference
Security Sales & Integration	Security Systems News Magazine
SecurityXchange	Seed Today
Selling Christmas Decorations	Selling Halloween
Semiconductor International	Semiconductor Packaging
Seminar in Oncology	Sensors
Service Management	SGB(Sporting Goods Business)
Shipping Digest	SHOOT
Show News	Sign Builder Illustrated
Sign Builder Illustrated Buyers Guide	Signs of the Times
Skin & Allergy News	Skin Inc.
Slot Manager	SMA Adviser
Small Firm Business	Snow Business
Software Development	SoHo Today
Solid State Technology	Sound & Vibration
Southeast Construction	Southeast Farm Press
Southwest Contractor	Southwest Farm Press
Special Events Magazine	Specialty Food Magazine
Spectroscopy	Spinal Disorders
Spine	Sporting Goods & Activewear Buyers
Sports Medicine & Arthroscopy Review	SQL Server Magazine
SRDS International Media Guides	SRDS Media Planning System
SRO (Staging Rental Operations)	Star Service
Stateways	Stitches Magazine
Structural Engineer	Successful Dealer
Successful Farming	Successful Meetings
Supermarket News	Supply Chain Management Review
Surface Mount Technology (SMT)	Surgery
Surgical Laparoscopy & Endoscopy	Surgical Neurology
Surgical Products	Survey of Anesthesiology
Survey of Ophthalmology	Swine Practitioner
Syllabus	Sys Admin
T&D World Expo	Takeover Stock Report
Target Marketing	TCPmag.com
Tech Decisions	Techniques in Foot and Ankle Surgery
Techniques in Hand & Upper Extension Surgery	Techniques in Knee Surgery

## Response of ABM to TW et al./ABM-2

Techniques in Neurosurgery	Techniques in Ophthalmology
Techniques in Orthopaedics	Techniques in Shoulder and Elbow Surgery
Technology & Learning	Technology Media Source
Telecom	Telephony
Television Week	Test & Measurement World
Texas Construction	Texas Contractor (Reed Construction Data)
Texas Lawyer	Textile World
Textile World Blue Book	The Boston Law Tribune
The Data Warehousing Institute	The Legal Intelligencer
The Lifestyle Market Analyst	The Meetings Guide to the East
The Meetings Guide to the South	The Meetings Guide to the West
The National Law Journal	The Prairie Star
The Recorder	Therapeutic Drug Monitoring
Tire Business	Tire Review
Today's Garden Center	Tomorrow's Technician
Tools of the Trade	Top Bid
Top Producer	Topics in MRI
Track Yearbook	Traders Magazine
Traffic World	Trailer/Body Builders
Training/Online Learning	Transform Magazine
Transmission & Distribution World	Transplantation Proceedings
Transportation Telephone Ticker	Travel Agent
Travel Weekly	TravelAge West
Treasury & Risk Management	TrendWatch Graphic Arts
Trendz	Trexpo (East & West) (trade shows)
TriState Neighbor	Truck & SUV Performance
Truck Blue Book & Seminar	Truck Parts & Service
Truck Sales & Leasing	Truckers News Magazine
Trucking Opportunity Directory	TruckStop Travel Plaza
TruckStops Express	Trusts & Estates
TV	TV & Cable Source
TWICE (This Week in Consumer Electronics)	U. S. Banker
U.S. Banker Weekly Bulletin	U.S. Pharmacist
Ultrasound in Medicine & Biology	Ultrasound Quarterly
Underhood Service	University Business Magazine
Urology	Urology Times
U.S. Custom House Guide	Used Equipment Directory
Utilities IT	Utility Automation
VARBusiness	Variety
Variety.com	Vegetable Insect Management
Vehicle Remarketing	Venture Capital Analyst - Health Care Edition
Venture Capital Analyst - Technology Edition	Venture Reporter
VentureOne	VentureOne Exchange
VentureOne Summit	VentureSource
Vertical Systems Reseller	Veterinary Economics
Veterinary Medicine	Video Business
Video Store Magazine	Video Systems
Vision Monday	Vision Systems Design
VM + SD	Wall Street & Technology
Ward'sAuto.com	Ward's Automotive Reports
Ward's AutoWorld	Ward's Dealer Business

## Response of ABM to TW et al./ABM-2

Ward's Information Products	Warehouse Distribution Directory
Washington Technology	Washingtonotechnology.com
Waste Age	Waste Handling Equipment News
Waste News	Water News
Water Technology	Watercolor
WaterWorld	Watt Poultry USA
Wearables Business	WebCPA Week
Website that provides business information	Weed Control Manual
Welding Design & Fabrication	Wellness Foods
Western Builder (Reed Construction Data)	Western Farm Press
Western Fruit Grower	Western Massachusetts Law Tribune
Who's Who in the Egg and Poultry Industries	Wildfire
Wildland Firefighter	Windows & .NET Magazine
Windows Developer Network	Wired House, The
Wireless Design & Development	Wireless Review
Wireless Systems Design	Wireless Week
Woman Dentist Journal	Women's & Children's Wear Buyers
Women's Health in Primary Care	Wood & Wood Products
WorkBoat	Workforce
WorkHorse Truck & Equipment (Reed Construction Data)	Workout Wire
World Aviation Directory & Aerospace Database	World Leaders in Print
World-Grain.com	www.betterroads.com
www.gasindustries.com	

## Response of ABM to TW et al./ABM-3

### TW et al./ABM-3

- a. For each ABM-member publication identified in your response to TW et al./ABM-2, please identify the ABM member by which it is published.
- b. Additionally, please indicate which of the following apply to each publication:
  - (1) the publication is distributed through the U.S. Postal Service as a regular rate non-requester publication;
  - (2) it is distributed through the U.S. Postal Service as a requester publication;
  - (3) it is distributed through the U.S. Postal Service as a nonprofit or classroom publication;
  - (4) it is distributed through the U.S. Postal Service under a different rate structure (please specify);
  - (5) it is distributed in hardcopy form by means other than the U.S. Postal Service;
  - (6) it is distributed electronically by email to those who request it;
  - (7) it is distributed electronically by email to paying subscribers;
  - (8) an electronic version can be downloaded from the internet by all who request it;
  - (9) an electronic version can be downloaded from the internet by paying subscribers;
  - (10) some of the publication's editorial contents are accessible on an internet website;
  - (11) all or most of the publication's editorial contents are accessible on an internet website to paying subscribers;
  - (12) all or most of the publication's editorial contents are accessible on an internet website, either without restriction or to all who complete an online survey;
  - (13) the publication's electronic version offers features not available in the hardcopy version, e.g., ability to search the text, ability to click through to references made in the text, additional editorial content, more frequent updates, etc.

## Response of ABM to TW et al./ABM-3

### Response

a. If this question is asking for the publisher of each of the approximately 1,500 publications on Table ABMList-2, that information can be found in the American Business Media directory on the American Business Media website, the URL for which is set out in your question TW et al./ABM-1 a. If this question refers to publications identified in response to third sentence of question TW et al./ABM-2, there are none that we know of.

b. To the extent that the question refers to each of the approximately 1,500 publications on Table ABMList-2, American Business Media responds to the subparts as follows:

(1) American Business Media does not routinely collect or maintain information that will permit it to identify in any systematic way which of the publications are entered as regular rate, non-requester publications, although we do know from general knowledge that there are many in this category.

(2) American Business Media does not routinely collect or maintain information that will permit it to identify in any systematic way which of the publications are entered as regular requester publications, although we do know from general knowledge that there are many in this category.

### **Response of ABM to TW et al./ABM-3**

(3) American Business Media does not routinely collect or maintain information that will permit it to identify in any systematic way which of the publications are entered as regular nonprofit or classroom publications, although we do know from general knowledge that there are very few, if any.

(4) American Business Media does not routinely collect or maintain information that will permit it to identify in any systematic way which of the publications are entered under a different rate structure, although from general knowledge we believe that there may be some First-Class newsletters and some Standard mail publications.

(5) American Business Media does not routinely collect or maintain information that will permit it to identify in any systematic way which of the publications are distributed in hard copy form by means other than the Postal Service, although from general knowledge we do know that some member publications, primarily dailies or weeklies, distribute a portion of their copies in select urban locations through private delivery and that some of the member publications with paid circulation distribute a portion of that circulation on newsstands.

(6) American Business Media does not routinely collect or maintain information that will permit it to identify in any systematic way which of the publications are distributed electronically by email to those who request it.

### **Response of ABM to TW et al./ABM-3**

(7) American Business Media does not routinely collect or maintain information that will permit it to identify in any systematic way which of the publications are distributed electronically by email to paying subscribers.

(8) American Business Media does not routinely collect or maintain information that will permit it to identify publications with an electronic version that can be downloaded from the internet by all who request it.

(9) American Business Media does not routinely collect or maintain information that will permit it to identify in any systematic way publications with an electronic version that can be downloaded from the internet by paying subscribers.

(10) American Business Media does not routinely collect or maintain information that will permit it to identify in any systematic way publications with some editorial content accessible on a website.

(11) American Business Media does not routinely collect or maintain information that will permit it to identify in any systematic way publications with all or most editorial content accessible on a website to paying subscribers.

(12) American Business Media does not routinely collect or maintain information that will permit it to identify in any systematic way publications with editorial content

### **Response of ABM to TW et al./ABM-3**

accessible on a website either without restriction or to all who complete an online survey.

(13) American Business Media does not routinely collect or maintain information that will permit it to identify in any systematic way publications with an electronic version not available in the hard copy version.

## Response of ABM to TW et al./ABM-6

### TW et al./ABM-6:

Please provide a table that indicates, for each ABM-member publication that is mailed under Periodicals rates, how fulfillment is performed for that publication, that is the planning of bundles at different presort levels to contain the individual mailed pieces, and sacks and pallets at different presort levels to contain the individual bundles for a given issue. Specifically, indicate for each such publication which of the following apply:

- a. fulfillment is performed manually, without any aid of a computer;
- b. it is performed using a computer program or methodology developed specifically for that publication;
- c. it is performed using a commercially available computer software program;
- d. the program used for fulfillment has the capability to count the number of bundles, sacks and pallets produced by a given mailing;
- e. the program used for fulfillment contains various optional parameters whose setting affects the number of bundles, sacks and pallets produced by a given mailing;
- f. the printer, rather than the individual publication or its owner, assumes responsibility for the fulfillment function, after the publisher provides a list of addresses to which the publication is to be mailed;
- g. mail.dat files are generated for each issue.

### RESPONSE

American Business Media does not routinely collect or maintain information that will permit it to identify in any systematic way how fulfillment is performed for each American Business Media member publication.

a. through f. American Business Media does not have this information.

### **Response of ABM to TW et al./ABM-6**

g. American Business Media does not routinely collect or maintain information that will permit it to identify in any systematic way which publications generate mail.dat files for each issue. In connection with a mailing characteristics survey undertaken in 2001, American Business Media collected mail.dat files for approximately 190 member publications. For further information please refer to the future response to TW et al./ABM-7.

## Response of ABM to TW et al./ABM-8

### TW et al./ABM-8:

- a. Please estimate as closely as possible the number of ABM-member publications that currently participate in:
  - (1) a co-mailing program; or
  - (2) a co-palletization program.
- b. Additionally, please identify those publications and for each such publication state:
  - (1) where it is being co-mailed or co-palletized;
  - (2) whether it is being co-mailed or just co-palletized;
  - (3) whether it is also part of a pool shipment program arranged by a printer or consolidator.

### RESPONSE

American Business Media does not routinely collect or maintain information that will permit it to estimate the number of American Business Media member publications that currently participate in a co-mailing or co-palletization program. We do know from general knowledge that some periodicals published by Hanley Wood LLC and Quadrant Media Corporation co-palletize at RR Donnelley, that some periodicals published by Crain Communications co-palletize at QuadGraphics and that the periodicals of other members are co-palletized at Publishers Press. American Business Media believes that the number of publications in these programs is increasing and will continue to increase, and (as shown, for example by interrogatories TW et al./ABM-53 through 63) American Business Media is trying to educate members about the desirability of co-palletizing and co-mailing for many members.

## Response of ABM to TW et al./ABM-9

### TW et al./ABM-9:

For each ABM member that is a printer of Periodicals, please provide the following information:

- a. number of printing plants owned by the printer and location of each plant;
- b. total revenues and revenues from the printing and distribution of Periodicals;
- c. total number of Periodicals titles printed and the annual number of Periodicals copies;
- d. total number of ABM-member Periodicals titles printed and the annual number of copies for such Periodicals;
- e. whether the printer offers co-mailing and, if so, the number of titles that are co-mailed and the maximum number of titles that can be co-mailed together using the current equipment;
- f. whether the printer has current plans either to start a co-mailing program or to expand its existing co-mailing capacity;
- g. whether the printer offers co-palletization for titles that are not also co-mailed and, if so, the total number of such co-palletized titles;
- h. whether the printer arranges dropshipping to downstream postal facilities and, if so, the approximate number of downstream facilities reached by these pool shipments and the number of printed Periodicals that participate;
- i. whether the printer currently offers selective binding;
- j. whether the printer currently has a polywrap machine.

### RESPONSE

a. through j. American Business Media does not routinely collect or maintain information about the operations of its printer members. We expect that much of this information is readily available from the printers themselves and from Time Warner, et al. witness Joe Schick. Nevertheless, based upon general information American Business Media can provide partial responses to the following parts:

## **Response of ABM to TW et al./ABM-9**

- e. American Business Media knows that QuadGraphics offers co-mailing.
  
- f. Based upon a very recent announcement, American Business Media believes that Quebecor World has plans to start a co-mailing program.
  
- g. American Business Media knows that RR Donnelley, Publishers Press and Quad Graphics offers co-palletizing.
  
- h. American Business Media knows from Joe Schick's testimony in this docket that QuadGraphics arranges for dropshipping and expects that others do as well, including RR Donnelley, Quebecor World, and Brown.

## **Response of ABM to TW et al./ABM-10**

### **TW et al./ABM-10:**

Please confirm that on the American Business Media (ABM) website ([www.americanbusinessmedia.com](http://www.americanbusinessmedia.com)) the "About" section contains (or contained as of July 21, 2004) the following statement:

"American Business Media has 229 member companies, representing over 3,000 print and electronic titles and more than 800 trade shows and events. They reach an audience of 100 million professionals and accounted for over \$19 billion in industry revenues in 2003."

### **RESPONSE**

Confirmed.

## **Response of ABM to TW et al./ABM-11**

### **TW et al./ABM-11:**

Please confirm that in the ABM 2002-2003 Annual Report ABM Chairman Robert Krakoff makes the following statement in his "Chairman's Report":

“American Business Media is also serious about its own business. The Association is in tip-top financial shape, with a strong balance sheet. This year, we made an unbudgeted \$500,000 contribution to our surplus.”

### **RESPONSE**

American Business Media objects to this question on the ground that it is not reasonably calculated to lead to the discovery of admissible evidence.

Notwithstanding this objection, American Business Media confirms.

## **Response of ABM to TW et al./ABM-12**

### **TW et al./ABM-12:**

Please confirm that the ABM website contains (or contained as of July 21, 2004) a digital version of the ABM 2002-2003 Annual Report.

### **RESPONSE**

Confirmed.

## **Response of ABM to TW et al./ABM-13**

### **TW et al./ABM-13:**

Please confirm that the digital version of the ABM 2002-2003 Annual Report states that it is: "Brought to you by NXT book media and Reprint Management Services."

### **RESPONSE**

Confirmed.

## **Response of ABM to TW et al./ABM-14**

### **TW et al./ABM-14:**

Please confirm that the ABM website has (or had as of July 21, 2004) a link to NXT book media.

### **RESPONSE**

Confirmed.

## **Response of ABM to TW et al./ABM-15**

### **TW et al./ABM-15:**

Please confirm that [www.nxtbookmedia.com](http://www.nxtbookmedia.com) contains examples of four publications and/or supplements that exist in a digital format: Club Industry, Folio:/Circulation Management, Managing Automation, and CMP Media, Call Center Magazine.

### **RESPONSE**

American Business Media objects to this question on the ground that it asks American Business Media to confirm information on a website that American Business Media does not control or maintain and to which the complainants can refer with or without American Business Media's "confirmation" of what it contains.

Notwithstanding this objection, American Business Media confirms that the cited web site lists four publications and/or supplements that exist in digital format.

## **Response of ABM to TW et al./ABM-16**

### **TW et al./ABM-16:**

Please confirm that the magazines and/or supplements referred to in the previous interrogatory are published by ABM member companies.

### **RESPONSE**

Confirmed.

## **Response of ABM to TW et al./ABM-17**

### **TW et al./ABM-17:**

Please confirm that the digital version of Club Industry plays the following statement when the publication is opened to page 1:

“Hello, and welcome to the revolution in Business to Business Publishing. The staff of Club Industry is pleased to provide you with a unique on-line publishing format. This format called E-Zine delivers Club Industry’s editorial content and advertising to your location faster, while at the same time, allowing you easy access complemented by new interactive features. Now, in it you will find the departments, columns and feature articles you are used to seeing in our print product, only sooner. Now, we will continue to print, publish and produce our regular paper product without interruption, and we assure you that you will continue to receive the regular monthly print product of Club Industry.”

### **RESPONSE**

American Business Media objects to this question on the ground that it asks American Business Media to confirm information on a website that American Business Media does not control or maintain and to which the complainants can refer with or without American Business Media’s “confirmation” of what it contains.

Notwithstanding this objection, American Business Media confirms that the quote is a portion of the statement that is played.

## **Response of ABM to TW et al./ABM-18**

### **TW et al./ABM-18:**

Please confirm that the digital version of Club Industry contains editorial content on page 3 and advertising content on page 4.

### **RESPONSE**

American Business Media objects to this question on the ground that it asks American Business Media to confirm information on a website that American Business Media does not control or maintain and to which the complainants can refer with or without American Business Media's "confirmation" of what it contains.

Notwithstanding this objection, American Business Media confirms.

## **Response of ABM to TW et al./ABM-19**

### **TW et al./ABM-19:**

Please confirm that the digital version of Digital Distribution contains advertising content on pages 4, 8, 12, 16, and 20.

### **RESPONSE**

American Business Media objects to this question on the ground that it asks American Business Media to confirm information on a website that American Business Media does not control or maintain and to which the complainants can refer with or without American Business Media's "confirmation" of what it contains.

American Business Media cannot confirm, because American Business Media has no information about "the digital version of Digital Distribution." It is not one of the four titles referred to in TW et al./ABM-15.

## **Response of ABM to TW et al./ABM-20**

### **TW et al./ABM-20:**

Please confirm that the digital version of Digital Distribution contains the following statement in the first paragraph on page 6:

“On the business-to-business side, however, more tangible developments are afoot. Two B-to-B publishers have had digital editions up and running for some time now, and a Who’s Who of players – including Reed Business Information, Ziff Davis Media, International Data Group (IDG), CMP Media, Hearst Business Media and Primedia Business Magazines and Media – are actively testing digital editions of existing publications and other formats.”

### **RESPONSE**

American Business Media objects to this question on the ground that it asks American Business Media to confirm information on a website that American Business Media does not control or maintain and to which the complainants can refer with or without American Business Media’s “confirmation” of what it contains.

American Business Media cannot confirm, because American Business Media has no information about “the digital version of Digital Distribution.” It is not one of the four titles referred to in TW et al./ABM-15.

## **Response of ABM to TW et al./ABM-21**

### **TW et al./ABM-21:**

Please confirm that page 7 of the digital version of Digital Distribution contains the following quotation from Jeff DeBalko, President, IDG Global Communications: “We’re cautiously optimistic about the volumes of people who are signing up for or paying for digital subscriptions.”

### **RESPONSE**

American Business Media objects to this question on the ground that it asks American Business Media to confirm information on a website that American Business Media does not control or maintain and to which the complainants can refer with or without American Business Media’s “confirmation” of what it contains.

American Business Media cannot confirm, because American Business Media has no information about “the digital version of Digital Distribution.” It is not one of the four titles referred to in TW et al./ABM-15.

## **Response of ABM to TW et al./ABM-22**

### **TW et al./ABM-22:**

Please confirm that page 7 of the digital version of Digital Distribution contains the following quotation from Tom Kemp, Chairman and CEO of Penton Media: “We’re still market testing digital versions, but this will clearly be a trend in our industry.”

### **RESPONSE**

American Business Media objects to this question on the ground that it asks American Business Media to confirm information on a website that American Business Media does not control or maintain and to which the complainants can refer with or without American Business Media’s “confirmation” of what it contains.

American Business Media cannot confirm, because American Business Media has no information about “the digital version of Digital Distribution.” It is not one of the four titles referred to in TW et al./ABM-15.

## **Response of ABM to TW et al./ABM-23**

### **TW et al./ABM-23:**

Please confirm that paragraph 8 on page 7 of the digital version of Digital Distribution contains the following statement:

“Business audiences also tend to be more comfortable with new technology, and are more likely to have access to broadband capabilities that enable the most user-friendly accessing of digital editions.”

### **RESPONSE**

American Business Media objects to this question on the ground that it asks American Business Media to confirm information on a website that American Business Media does not control or maintain and to which the complainants can refer with or without American Business Media’s “confirmation” of what it contains.

American Business Media cannot confirm, because American Business Media has no information about “the digital version of Digital Distribution.” It is not one of the four titles referred to in TW et al./ABM-15.

## **Response of ABM to TW et al./ABM-24**

### **TW et al./ABM-24:**

Please confirm that paragraph 9 on page 7 of the digital version of Digital Distribution contains the following statement:

“Rapidly changing business markets and Internet information offerings have put pressure on B-to-B’s to deliver content in a more timely fashion. And in many B-to-B sectors, the ability to archive and search content is a professional boon – a factor which, in combination with timeliness, may go a long way in helping to overcome resistance to paying for electronically delivered information, for those publishers seeking to develop user-based revenue streams.”

### **RESPONSE**

American Business Media objects to this question on the ground that it asks American Business Media to confirm information on a website that American Business Media does not control or maintain and to which the complainants can refer with or without American Business Media’s “confirmation” of what it contains.

American Business Media cannot confirm, because American Business Media has no information about “the digital version of Digital Distribution.” It is not one of the four titles referred to in TW et al./ABM-15.

## **Response of ABM to TW et al./ABM-25**

### **TW et al./ABM-25:**

Please confirm that paragraph 3 on page 9 of the digital version of Digital Distribution reads as follows:

“Potential cost savings are obviously a major draw. Qualified U.S. subscribers to NASA Tech Briefs, which launched a PDF edition in November 2001, may receive either the print or digital version on a controlled basis, but pay \$24 per year to receive both. International subscribers pay \$36 to receive a PDF subscription, versus \$195 for a print sub. About 18,500 or nearly 10 percent of its total 195,000 subscribers, have opted for digital only – producing a monthly savings of more than \$10,000 on printing alone, according to Hugh Dowling, circulation director for NTB and other Associated Business Publications (ABPI) titles.”

### **RESPONSE**

American Business Media objects to this question on the ground that it asks American Business Media to confirm information on a website that American Business Media does not control or maintain and to which the complainants can refer with or without American Business Media’s “confirmation” of what it contains.

American Business Media cannot confirm, because American Business Media has no information about “the digital version of Digital Distribution.” It is not one of the four titles referred to in TW et al./ABM-15.

## **Response of ABM to TW et al./ABM-26**

### **TW et al./ABM-26:**

Please confirm that paragraph 4 on page 9 of the digital version of Digital Distribution contains the following:

“BZ Media’s Bahr, who has an in-house digital distribution system developed from off-the-shelf software, reports that it costs about four cents per copy to produce and distribute a digital copy of SD Times compared to 56 cents for a print copy.”

### **RESPONSE**

American Business Media objects to this question on the ground that it asks American Business Media to confirm information on a website that American Business Media does not control or maintain and to which the complainants can refer with or without American Business Media’s “confirmation” of what it contains.

American Business Media cannot confirm, because American Business Media has no information about “the digital version of Digital Distribution.” It is not one of the four titles referred to in TW et al./ABM-15.

## **Response of ABM to TW et al./ABM-27**

### **TW et al./ABM-27:**

Please confirm that paragraph 3 on page 11 of the digital version of Digital Distribution contains the following:

“Eight percent (3,859) of SD Times’ total 46,759 qualified, controlled subscribers have opted to receive both its print and digital editions and about 20 percent (9,517) receive digital only.”

### **RESPONSE**

American Business Media objects to this question on the ground that it asks American Business Media to confirm information on a website that American Business Media does not control or maintain and to which the complainants can refer with or without American Business Media’s “confirmation” of what it contains.

American Business Media cannot confirm, because American Business Media has no information about “the digital version of Digital Distribution.” It is not one of the four titles referred to in TW et al./ABM-15.

## **Response of ABM to TW et al./ABM-28**

### **TW et al./ABM-28:**

Please confirm that the digital version of Managing Automation contains both advertising and editorial content.

### **RESPONSE**

American Business Media objects to this question on the ground that it asks American Business Media to confirm information on a website that American Business Media does not control or maintain and to which the complainants can refer with or without American Business Media's "confirmation" of what it contains.

Notwithstanding this objection, American Business Media confirms.

## **Response of ABM to TW et al./ABM-29**

### **TW et al./ABM-29:**

Please confirm that the digital version of Call Center Magazine contains both advertising and editorial content.

### **RESPONSE**

American Business Media objects to this question on the ground that it asks American Business Media to confirm information on a website that American Business Media does not control or maintain and to which the complainants can refer with or without American Business Media's "confirmation" of what it contains.

Notwithstanding this objection, American Business Media confirms.

## **Response of ABM to TW et al./ABM-30**

### **TW et al./ABM-30:**

Please confirm that the home tab at [www.nxtbookmedia.com](http://www.nxtbookmedia.com) contains the following statement:

“ Readers like NXTbooks. We continually survey our readers and have found that 93% indicate they enjoy reading or receiving a NXT book and over 90% indicated NXTbooks have enhanced content value, specifically the immediacy and depth offered versus hardcopy. In addition, 76% to 94% have indicated they perceive the NXTbook as a better source of information for their decision-making tasks.”

### **RESPONSE**

American Business Media objects to this question on the ground that it asks American Business Media to confirm information on a website that American Business Media does not control or maintain and to which the complainants can refer with or without American Business Media’s “confirmation” of what it contains.

Notwithstanding this objection, American Business Media confirms.

## **Response of ABM to TW et al./ABM-31**

### **TW et al./ABM-31:**

Please confirm that the ABM website contains (or contained as of July 21, 2004) a document entitled "REVIEW OF THE ABM ELECTRONIC MEDIA COMMITTEE WEB SURVEY RESULTS 2002, *Analysis and Commentary on the ABM Survey Responses*, Prepared by The Publishing & Media Group."

### **RESPONSE**

Confirmed.

## Response of ABM to TW et al./ABM-32

### TW et al./ABM-32:

Please confirm that the document referred to in the previous interrogatory states (at 11) under the caption "Profile of survey respondents":

- a. "This survey was sent electronically to all ABM members. After a second distribution, a total of forty three companies responded on a blind, unidentified basis. Review of the responses indicates that virtually all respondents were business media publishers with both traditional print media offerings as well as multiple Web and other digital offerings. The data presented herein reflects the opinions of these respondents."
- b. "Business media appears to be a sector of the publishing industry with a comparatively high reliance on electronic media. Respondents reported that they produce a wide range of e-media products, from traditional websites to electronic conferencing, custom-published e-newsletters and webcasting."
- c. "Electronic media appears to be evolving into a business norm. Every respondent to the survey has a presence on the web. In fact, the print magazine to website ratio is fairly even, with one website for just about every print magazine. This ratio does not decline as scale increases. About half of respondents produce six or more print magazines, and about half also have six or more websites. These statistics could suggest that many publishers believe that print is no longer enough. If a product comes out in paper, it should be matched with an electronic companion."
- d. "Beyond websites, the e-newsletter is the second most common type of e-media.

Of the 100% of respondents producing print magazines, 88% also distribute electronic newsletters. 42% of respondents produce one newsletter per print publication, while 46% produce two or more. Therefore, e-newsletters do not appear to be replacing print media, rather they are provided as an accompaniment or enhancement to print."

### RESPONSE

Confirmed.

## Response of ABM to TW et al./ABM-33

### TW et al./ABM-33:

Please confirm that the document referred to in the previous interrogatory reports the following results (at 12) under the caption "Profile of survey respondents":

"Q 1. What types of publications and/or content venues do you offer today? Check all that apply. (44 respondents)

	<u>#</u>	<u>%<sup>1</sup></u>
#1 Controlled Circulation Magazines	37	84%
#2 Free E-Newsletters	36	82%
#3 Directories	30	68%
#4 Paid Magazines	29	66%
#5 Online Databases	19	43%
#6 Print Newsletters	14	32%
#7 CD-Rom Products	9	20%
#8 Paid E-Newsletters	4	9%
Other	8	18%

Q 2. How many print periodicals do you currently publish? (42 respondents)

	<u>#</u>	<u>%</u>		<u>#</u>	<u>%</u>
1-5:	22	52%	26-50:	4	10%
6-10:	5	12%	51-100:	3	7%
11-15:	2	5%	100 +:	2	5%
16-25:	4	10%			

Q 3. How many web sites do you have currently? (43 respondents)

	<u>#</u>	<u>%</u>		<u>#</u>	<u>%</u>
1-5:	24	56%	26-50:	4	9%
6-10:	7	16%	51-100:	2	5%
11-15:	2	5%	100 +:	1	2%
16-25:	3	7%			

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<sup>1</sup> Throughout the report, # refers to the number of respondents who provided the answer, % refers to the percentage of total respondents who answered the question.

### Response of ABM to TW et al./ABM-33

Q 4. How many E-mail newsletters do you offer per print publication? (43 respondents)<sup>2</sup>

	#	%
1:	18	42%
2-4:	12	27%
5-7:	3	7%
8+:	5	12%"

<sup>2</sup> In Q. 1, seven responded that they don't offer e-newsletters, in Q. 4, five report that they don't offer e-newsletters.

### RESPONSE

Confirmed.

**Response of ABM to TW et al./ABM-34**

**TW et al./ABM-34:**

Please confirm that the document referred to in the previous interrogatory states (at 25) under the caption "Electronic content and web capabilities":

"When asked about content, we found that 88% of respondents currently offer unique content on their websites that is not offered in their print titles."

**RESPONSE**

Confirmed.

## **Response of ABM to TW et al./ABM-35**

### **TW et al./ABM-35:**

Please confirm that the document referred to in the previous interrogatory states (at 14) under the caption "Financial performance of electronic media":

"Respondents were asked if their electronic media venue was producing a profit, after operating costs and actual revenue. To this question, 45% responded yes. When asked the same question, but after crediting their web site revenue or savings from other departments back to the web site, we see a five point lift, meaning 50% reported yes, their electronic media venue was producing a profit. Although like statistics are not available in other media segments, these numbers appear to be reassuringly high, especially considering that electronic media is still a comparatively new addition to the industry. These positive results combined with comments on future improvements to their electronic publishing venues, indicate that the financial contributions should continue to grow in the future."

### **RESPONSE**

Confirmed.

## Response of ABM to TW et al./ABM-36

### TW et al./ABM-36:

Please confirm that the document referred to in the previous interrogatory states (at 18) under the caption "Electronic media revenue generators":

- a. "Survey respondents reported several different sources of revenue within electronic media. The most commonly reported source is from advertising followed by paid subscriptions, digital article sales and product sales, and finally the sale of subscriber and registration lists.  
Three-quarters of respondents cited online advertising as a source of electronic revenue. Over half of respondents reported 'specialty sponsorships' as the greatest source of ad revenue. Advertisers were noted as having a strong interest in sponsoring content compatible with their own products and mission, making a sponsorship more of a targeted business initiative than a general ad buy. The general ad buy, however--or in this case the 'CPM-based banner ad'--came in second as generating the most advertising revenue, with 34% of respondents. "
- b. "Still, online subscriptions to print publications – whether paid or controlled—are being offered by almost every respondent to the survey, with 90% currently making them available, and an additional 5% planning to offer subscriptions electronically. Even though there is very little direct revenue attached to these subscribers because most publications are controlled, the administrative savings of technology-generated names, along with building revenue-producing lists, and the growth of circulation for ad sales are all very valuable contributors, and are seen as such by respondents.

As more readers adapt to online as a media source, electronically produced print subscriptions are expected to increase."

### RESPONSE

Confirmed.

## **Response of ABM to TW et al./ABM-37**

### **TW et al./ABM-37:**

Please confirm that the ABM website contains (or contained as of July 21, 2004) a document entitled "ABM Brand Extension Committee, Case Study Spot Light Series: TOPIC: WEB SITES."

### **RESPONSE**

Confirmed.

## **Response of ABM to TW et al./ABM-38**

### **TW et al./ABM-38:**

Please confirm that the document referred to in the previous interrogatory contains (at 1) the following statements:

- a. "According to ABM's 2002 Publishing Cost Report, Internet revenues had grown to become a significant revenue source, at least for the largest publications. . . ."
- b. "While the revenue contribution was still relatively small, the profitability of Internet ventures reported in the 2002 survey was more impressive. The largest publications with 31 or more issues per year and revenues over \$10 million reported average profit from Internet activities of \$818,879, a contribution margin of 43%."

### **RESPONSE**

Confirmed.

## **Response of ABM to TW et al./ABM-39**

### **TW et al./ABM-39:**

Please confirm that the document referred to in the previous interrogatory presents a case study of "fesmag.com, the Web site of *Foodservice Equipment & Supplies Magazine*," published by Reed Business Information.

### **RESPONSE**

Confirmed.

## Response of ABM to TW et al./ABM-40

### TW et al./ABM-40:

Please confirm that the case study referred to in the previous interrogatory provides (at 2-3) the following descriptive information about fesmag.com:

- a. **"Concept:** Launch a Web site that meets the needs of our audience by allowing them to gain access to timely news and breaking stories, as well as to reach potential customers with online product promotions and other forms of advertising. . . ."
- b. **"Execution:** Positioned the site as the industry's only source of breaking news and webexclusive business information, including feature stories and department articles. . . ."
- c. **"Best practices:** . . . We found that the best way to drive traffic to fesmag.com was to provide our subscribers with exclusive news reports and feature stories that do not run in the print product."

### RESPONSE

Confirmed.

## **Response of ABM to TW et al./ABM-41**

### **TW et al./ABM-41:**

Please confirm that the ABM website contains (or contained as of July 21, 2004) a document entitled "American Business Media Business Information Resources 2001 Survey."

### **RESPONSE**

Confirmed.

## **Response of ABM to TW et al./ABM-42**

### **TW et al./ABM-42:**

Please confirm that the document referred to in the previous interrogatory reports (at 2-3) that "763 usable responses" were received from a survey sample of 2,100 domestic recipients of ABM member publications.

### **RESPONSE**

Confirmed.

## **Response of ABM to TW et al./ABM-43**

### **TW et al./ABM-43:**

Please confirm that the document referred to in the previous interrogatory states (at 1) as follows:

- a. "The objective of the survey was to develop a sense for how readers of b2b publications in a cross section of markets utilize publications and Web sites."
- b. "In the past month, 79% of the respondents reported they read or looked through a b2b publication in support of their work."
- c. "63% of [the respondents] surveyed said they visited a b2b Web site in the past month and 54% of those surveyed reported they had visited an advertiser's Web site."

### **RESPONSE**

Confirmed.

## **Response of ABM to TW et al./ABM-44**

### **TW et al./ABM-44:**

Please confirm that the ABM website contains (or contained as of July 21, 2004) a document entitled "TIME WARNER & OTHERS FILE POSTAL RATE CASE By David Straus, Partner, Thompson Coburn," dated January 12, 2004.

### **RESPONSE**

Confirmed.

## **Response of ABM to TW et al./ABM-45**

### **TW et al./ABM-45:**

Please confirm that the document referred to in the previous interrogatory includes the following statement:

"Given the Postmaster General's continuing pledges not to raise rates before 2006, and because the Time Warner proposal would raise some rates while lowering others, we expect that the Postal Service would not implement any changes resulting from this case before the 2006 rate increase is put into effect."

### **RESPONSE**

American Business Media objects to this question on the ground that it is not reasonably calculated to lead to the discovery of admissible evidence.

Notwithstanding this objection, American Business Media confirms.

## **Response of ABM to TW et al./ABM-46**

### **TW et al./ABM-46:**

Please confirm that the ABM website contains (or contained as of July 21, 2004) a document entitled "Digital Media Best Practices: E-mail Newsletters – July 2003."

### **RESPONSE**

Confirmed.

## Response of ABM to TW et al./ABM-47

### TW et al./ABM-47:

Please confirm that the document referred to in the previous interrogatory states (at 1) as follows:

a. **"Introduction**

E-mail newsletters are one of the early success stories of digital media publishing. They strike a responsive chord among readers who want timely, regular information updates with the ability to get more in-depth information that is a click away. And they provide an effective and responsive venue for advertising clients. Thus, publishers have found them to be an ongoing source of ad revenue. . . ."

b. **"Methodology**

A five-person subcommittee of the Digital Media Council created a questionnaire covering all aspects of e-mail newsletter publishing: content development, circulation or audience development, advertising sales and distribution.

The committee then interviewed individual representatives of 16 publishing companies who are members of the American Business Media association. This group included: PennWell Corporation, McGraw-Hill Companies Inc., VNU-USA, Primedia Business Magazines & Media, Crain Communications, Inc., Summit Publishing, ST Media Group International, Sosland Publishing Co., Stamats Buildings Media, Edgell Communications, Hanley-Wood LLC, Jobson Publishing, IDG, Advanstar, Fairchild Publications, and Reed Business USA. . . ."

c. **"Overview**

All of the magazine publishers interviewed – regardless of size –were selected because they are publishing e-newsletters. Generally, these e-newsletters are associated with a magazine and Web site brand. Where there is more than one e-newsletter associated with a brand, the e-newsletters are targeted to different niches or sub-markets within the larger market or they have different purposes or roles.

## **Response of ABM to TW et al./ABM-47**

The primary purpose of e-newsletters is generating revenue – and that is almost always through advertising. . . ."

### **RESPONSE**

Confirmed.

## Response of ABM to TW et al./ABM-48

### TW et al./ABM-48:

Please confirm that the document referred to in the previous interrogatory states (at 3-4) as follows:

#### "Purpose of Newsletters . . .

- Provide Need-to-Know Information. . . [E]-newsletters are an opportunity to provide targeted information that might not otherwise reach an audience or reach that audience in an easy-to-read, easy-to-take-action format. For example, e-newsletters are focused on breaking news, highlights of the Web site, short tips and advice, and even short highlights of the magazine, depending upon each brand and how the newsletter supplements and complements other media of the brand.

- Generate Revenue. Most business-to-business publications have controlled magazine circulation, and that approach extends to e-newsletters. Thus, the predominant revenue model is advertising, and publishers are finding an interested group of advertisers who want to use this medium. . . ."

### RESPONSE

Confirmed.

## Response of ABM to TW et al./ABM-49

### TW et al./ABM-49:

Please confirm that the document referred to in the previous interrogatory states (at 5, 6 and 8) as follows:

a. **"Content Types . . .**

- News: As implied in the concept of 'newsletters' a majority of the newsletters are about industry news. They are daily, bi-weekly or weekly. Generally it's difficult to be a 'news' newsletter with less frequency. The primary purpose is to continue to establish the brand as a leader in gathering and providing news about an industry – and be a 'must have' source."

b. **"Sources of Content . . .**

The sources of the content vary by e-newsletter with no one source dominant in publishing. Content depends upon the publisher and the market. If content is only based on the print product, publishers feel that the electronic version reduces the readership of the print version. Hence, if the only source of revenue is the print product, there are future revenue/profit problems in only re-purposing print content."

c. **"Circulation Size**

Newsletter circulation sizes range from 1,200 to 240,000 – with most hovering in the 20,000 to 40,000 range. . . ."

## RESPONSE

Confirmed.

## Response of ABM to TW et al./ABM-50

### TW et al./ABM-50:

Please confirm that the document referred to in the previous interrogatory states (at 12 and 15) as follows:

a. **"Metrics . . .**

**- Best Practice**

With electronic media, publishers have the ability, as never before, to measure response and to better understand their audiences. With this information, they can both tailor editorial content and help guide advertisers with their message and choice of media. . . ."

b. **"Advertising Revenue**

The revenue base for e-newsletters generally mirrors the revenue base associated with the print or online publication. If the magazine has controlled circulation and is supported by ad revenue, then the e-newsletter generally follows that model. If the magazine or Web site has a paid subscription base, then the e-newsletter is often a subscription product or part of the paid subscription product package. In the survey of publishers for this project, almost all were advertising based."

### RESPONSE

Confirmed.

## **Response of ABM to TW et al./ABM-51**

### **TW et al./ABM-51:**

Please confirm that the ABM website contains (or contained as of July 21, 2004) a document entitled "Business-to-Business Media Study Final Report, Prepared for American Business Media . . . by Yankelovich Partners and Harris Interactive, October 4, 2001."

### **RESPONSE**

Confirmed.

## **Response of ABM to TW et al./ABM-52**

### **TW et al./ABM-52:**

Please confirm that the document referred to in the previous interrogatory states (at 3) as follows:

"American Business Media has over 230 members, encompassing:

- Over 1,300 member publications
- Over 1,400 Web sites
- 181 industries
- 88.9 million readers
- Over \$23 billion in advertising revenue in 2000"

### **RESPONSE**

Confirmed.

## Response of ABM to TW et al./ABM-53

### TW et al./ABM-53:

Please confirm that the document referred to in the previous interrogatory states (at 9, 13, 17-22 and 27 [footnotes omitted]) as follows:

- a. "Over the past two years, there has been a dramatic increase in time executives spend visiting b-to-b Web sites."
- b. "On a top-of-mind (unaided) basis, b-to-b media rank among the top sources of information for executives."

Professional/ Trade Magazines/Journals	46%
Internet/ Web Sites	44%"
- c. "Read B-to-B Magazine in Past Month" 83%"
- d. "Visited B-to -B Web Site in Past Month" 68%"
- e. "Number of B-to-B Magazine Titles Read During Past Month  
Average = 4.6 titles"
- f. "Time Spent Reading B-to-B Magazines During Past Week  
Average = 2 hours 15 minutes"
- g. "Number of Different B-to-B Web Sites Visited in Past Month  
Average = 7.5 sites"
- h. "Time Spent Visiting B-to-B Web Sites Visited in Past Week  
Average = 2 hours 46 minutes"
- i. "A LARGE NUMBER OF EXECUTIVES REPORT IN-DEPTH USE OF B-to-B WEB SITES  
Nearly half have searched archives of b-to-b Web sites, and one-third have purchased content. Figures are even higher when looking at only those executives reporting past month b-to-b Web site visitation."
- j. "•• B-to-B Web sites rate high for being 'primary sources for research' and providing 'access to the latest information.' "

### RESPONSE

Confirmed.

## **Response of ABM to TW et al./ABM-54**

### **TW et al./ABM-54:**

Please confirm that on January 7, 2004, there was an "ABM Breakfast Club" meeting on the subject "Co-Palletization."

### **RESPONSE**

Confirmed.

## **Response of ABM to TW et al./ABM-55**

### **TW et al./ABM-55:**

Please confirm that the meeting referred to in the previous interrogatory included remarks by ABM President and CEO Gordon T. Hughes and presentations by ABM Postal Counsel David Straus and Vice President of Circulation and Database Development for Hanley Wood, LLC, Nick Canvar (Sic: Cavnar), who was at that date a member of both the Government Affairs Committee and the Circulation Committee for ABM and the Circulation Managers Advisory Committee for BPA International, and who was previously Vice President, Circulation for Intertec Publishing, a Primedia division and has also held positions at Crain Communications, International Thomson, and Cahners Publishing.

### **RESPONSE**

Confirmed.

## Response of ABM to TW et al./ABM-56

### TW et al./ABM-56:

Please confirm that the "Meeting Notes" for the meeting referred to in the previous interrogatory include the following statements:

- a. "Attendees: . . . numerous R.R. Donnelley representatives (breakfast sponsor) and members from several other printing organizations (Banta, Publishers Press, Cadmus). Publishers included McGraw-Hill, Primedia, Advanstar and others. Several walk-ins. Total attendance estimated at 50."
- b. "David [Straus] explained the USPS is using a great deal of resources to process a small amount of pieces in sacks. He predicted the USPS would eventually force mailers out of sacks within the next 5 to 10 years. He then said the next rate case would include cost based rates with hefty increases for sacked mail."
- c. "Nick [Canvar] (sic) explained he has been involved in ABM postal affairs for many years and even testified for ABM in the '97 rate hearings. He told the audience it has always been the position of ABM and their members to fight against cost based rates, but times have changed. He continued by saying all Periodicals mailers must help the USPS control processing costs, and co-palletization is one method of achieving that goal.  
Nick Cavnar (then described Hanley Wood's participation in the R.R. Donnelley co-palletization program. . . . His fulfillment company provides the printer with a Mail.Dat file.  
Hanley Wood started the co-palletization program with RRD in June of 2003. RRD uses a central consolidation facility located in Bollingbrook, IL. The facility also acts as the RRD parcel sorting operation. Individual bundles prepared by multiple printing operations arrive with pre-barcode labels."  
"Nick Cavnar finished his presentation with a statement that all publishers must look at this long term and rates will continue to increase. He stated ABM members must invest with their vendors today to build the systems everyone will need for tomorrow."
- d. "Gordon Hughes adjoined the meeting with a brief comment that the membership must unite and support co-palletization because it will take costs out of the postal system."

### RESPONSE

American Business Media cannot identify the document referred to as "Meeting Notes."

After receipt of this interrogatory, counsel for American Business Media inquired of

### **Response of ABM to TW et al./ABM-56**

counsel for Time Warner and was provided with a copy of a document bearing the title "Meeting Notes," but without any identification of the author, the purpose for which it was written or the recipient(s). Therefore, although American Business Media can confirm that counsel for Time Warner produced a document entitled "Meeting Notes" that contains the language quoted, American Business Media cannot confirm that, in the words of this interrogatory "*the* meeting Notes" (emphasis supplied) contain any particular statement.

## **Response of ABM to TW et al./ABM-57**

### **TW et al./ABM-57:**

Please confirm that the program for the meeting referred to in the previous interrogatory includes the following item:

#### **"Co-Palletizing Small Circulation Magazines: A Case Study . . .**

Nick Canvar (sic) will talk about how magazines with circulation as low as 16,000 can co-palletize, and how Hanley Wood's program has benefited the company."

### **RESPONSE**

Confirmed.

## **Response of ABM to TW et al./ABM-58**

### **TW et al./ABM-58:**

Please confirm that a document distributed to attendees of the meeting referred to in the previous interrogatory, entitled "DAVID STRAUS: OUTLINE OF REMARKS ON CO-PALLETIZATION," includes the following item:

- "3. Why the Postal Service, cheered on by MPA, TW, Conde Nast (and others) wants you to palletize.
  - a. Pieces on pallets cheaper to handle, less prone to damage, less prone to bundle breakage.
  - b. Reducing processing costs for some constrains rates for all."

### **RESPONSE**

Confirmed.

## Response of ABM to TW et al./ABM-59

### TW et al./ABM-59:

Please confirm that a document distributed to attendees of the meeting referred to in the previous interrogatory, reproducing the slides used by Nick Canvar (sic) in his presentation on "Copalletization for the Small Magazine," includes (at the 6th, 8th, and 13th of 14 unpaginated pages) the following items:

a. **"Does it save money?"**

- Example: Publication with 21,351 copies, weighing 0.42 pounds
  - Postage with single entry: \$7,925
  - Postage with copalletization: \$6,662"

b. **"Does it improve mail efficiency?"**

- Dramatic reduction in sacks
- Delivery time from ADC/SCF entry point averages 3 to 9 days, compared to 8 to 14 for single entry
- Judging by subscriber complaints and some monitoring, HW has seen no degradation in delivery time"

c. **"Remember the long term!"**

- Small circ publishers need vendors to set up co palletizing and drop ship programs NOW!
- Alternative is dramatically higher postage costs
- Invest with your vendors today to build the systems you will need tomorrow"

### RESPONSE

Confirmed.

## **Response of ABM to TW et al./ABM-60**

### **TW et al./ABM-60:**

Please confirm that a document prepared by or for RR Donnelley and entitled "Reach Your Customers: DistributionOptimizer<sup>SM</sup> gives you the edge you need" was distributed to attendees of the meeting referred to in the previous interrogatory.

### **RESPONSE**

American Business Media recalls that a document prepared by or for RR Donnelley may have been distributed at that meeting but no longer has a copy of any such document and cannot confirm the title listed.

## **Response of ABM to TW et al./ABM-61**

### **TW et al./ABM-61:**

Please confirm that the document referred to in the previous interrogatory includes the following statement:

"RR Donnelley drives postal efficiencies for publishers by leveraging our scope and scale to provide distribution savings, predictable total cost and improved delivery times."

### **RESPONSE**

American Business Media recalls that a document prepared by or for RR Donnelley may have been distributed at that meeting but no longer has a copy of any such document and cannot confirm the statement identified.

## **Response of ABM to TW et al./ABM-62**

### **TW et al./ABM-62:**

Please confirm that a document prepared by or for RR Donnelley and entitled "How do you gain from scale without increasing circulation? Obtain postal discounts while improving USPS efficiencies with the RR Donnelley DistributionOptimizer<sup>SM</sup> service" was distributed to attendees of the meeting referred to in the previous interrogatory.

### **RESPONSE**

American Business Media recalls that a document prepared by or for RR Donnelley may have been distributed at that meeting but no longer has a copy of any such document and cannot confirm the statement identified.

## Response of ABM to TW et al./ABM-63

### TW et al./ABM-63:

Please confirm that the document referred to in the previous interrogatory includes the following statements:

- a. "The co-palletization discount helps to alleviate the cost of mailings prepared in sacks by allowing these periodicals to be co-palletized with other publishers' titles. Eliminating sacks from the mailstream reduces inefficiencies for the USPS and the publisher, ultimately removing cost from the total system."
- b. "Hanley Wood and BNP Media take advantage of the co-palletization discount through the DistributionOptimizer service. The co-palletization option is ideal for magazines with circulation or mailings under 100,000 and works by combining pre-sorted, bundled magazines from different publishers on the same pallet to meet minimum pallet volume requirements."
- c. " 'We participate because it will enable magazines with short-run lengths to mail more efficiently, which promises to hold down postal rates in the future,' says Canvar (sic). By the end of 2004, RR Donnelley will eliminate more than 2.5 million sacks. . . .  
Hanley Wood has enjoyed the ease of use of the co-palletization incentive through the DistributionOptimizer service. 'It works automatically--it's practically invisible to us,' says Canvar (sic). Keeping an eye on administrative costs and time, BNP Media has found the service beneficial as well. 'We attain discounts without having to change our process in any way,' says [Suzanne] Reeves [corporate production director, BNP Media].  
'Co-palletization ultimately provides faster delivery because mail on pallets is entered into the mailstream closer to its end destination,' says Canvar (sic)."

### RESPONSE

American Business Media recalls that a document prepared by or for RR Donnelley may have been distributed at that meeting but no longer has a copy of any such document and cannot confirm the statement identified.

## **Response of ABM to TW et al./ABM-64**

### **TW et al./ABM-64:**

Please identify each person whom ABM expects to call as a witness at the hearing in this docket and state the subject matter on which the witness is expected to testify (sic).

### **RESPONSE**

American Business Media's testimony is not due for nearly a month, and while discussions are underway with several possible witnesses, no final decision has been made about any individual witness. American Business Media will update this response when more information is available.