

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

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

Docket No. C2004-1

FIRST SET OF INTERROGATORIES OF TIME WARNER INC. ET AL.
TO AMERICAN BUSINESS MEDIA WITNESS CAVNAR
(TW ET AL./ABM-T1-1-8)
(September 15, 2004)

Pursuant to sections 25, 26 and 27 of the rules of practice, Time Warner Inc., Condé Nast Publications, a Division of Advance Magazine Publishers Inc., Newsweek, Inc., The Reader's Digest Association, Inc., and TV Guide Magazine Group, Inc. (collectively, Time Warner Inc. et al.) hereby direct the following interrogatories to American Business Media (ABM) witness Cavnar (ABM-T-1).

Time Warner Inc. et al. request that, in responding to these requests, ABM follow the guidelines set out in Time Warner Inc. et al.'s First Set of Interrogatories to ABM, filed July 27, 2004, which are incorporated by reference herein. If witness Cavnar is incapable of providing an answer to any question, it is requested that an answer be provided by another person capable of providing an answer.

Respectfully submitted,

s/ _____
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**FIRST SET OF INTERROGATORIES
FROM TIME WARNER INC. ET AL. TO WITNESS CAVNAR (AMB-T-1)**

TW et al./ABM-T1-1. Please provide a list of all Hanley Wood owned or operated publications and the projected rate impact (in dollars and as a percentage of current postage) upon each title if the proposed rates were implemented.

TW et al./ABM-T1-2. Have you conducted any analyses to determine if any changes in mailing behavior could be made to mitigate the impact of the proposed rates upon the Hanley Wood publications? If the answer to this is yes, please provide copies of all such analyses and the data on which they were based (e.g., mail.dat files).

TW et al./ABM-T1-3. Please provide a representative mail.dat file for each Hanley Wood publication.

TW et al./ABM-T1-4.

- a. Who performs the presort for Hanley Wood publications?
- b. Does this provider utilize parameters that define minimum package size, minimum sack size, and minimum pallet size prior to actually performing the presort?

TW et al./ABM-T1-5. Please identify the printer and the printer's location for each Hanley Wood publication.

TW et al./ABM-T1-6. On page 3, line 10, when referring to Hanley Wood's co-mailed titles, you indicate: "Currently, we net only a one percent savings, based on the cost of single entry postage." Have you evaluated your savings under multiple

entry postage? If so, please provide copies of all such analyses and the data on which they were based.

TW et al./ABM-T1-7. Please provide an advertising rate card for all Hanley Wood publications.

TW et al./ABM-T1-8. On page 21, line 11, you state: "I believe that many Periodicals mailers would see their rates increase above the Standard rates, creating, it would seem, an ECSI penalty." Please identify the titles that you have analyzed to reach this conclusion and provide the analysis for each such title. Please provide any mail.dat file and any spreadsheet file used in your analysis.