

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

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

Docket No. C2004-1

FOLLOW-UP INTERROGATORY OF TIME WARNER INC. ET AL.
TO AMERICAN BUSINESS MEDIA WITNESS BRADFIELD
(TW ET AL./ABM-T2-10)
(September 30, 2004)

Pursuant to section 26(a) 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 interrogatory to American Business Media (ABM) witness Bradfield (ABM-T-2).

Time Warner Inc. et al. request that, in responding to this request, 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 Bradfield is incapable of providing an answer, it is requested that an answer be provided by another person capable of providing an answer.

Respectfully submitted,

s/ _____
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**FOLLOW-UP INTERROGATORY
OF TIME WARNER INC. ET AL. TO WITNESS BRADFIELD (ABM-T-2)**

TW et al./ABM-T3-10 In response to TW et al./ABM-T2-1 you list the VNU Periodicals and state that you analyzed the impact of the proposed rates on 25 of them. You further indicate that the results are shown in lines 91-115 of Exhibit LB-1. The table attached to this interrogatory is from an Excel spreadsheet that was provided by ABM counsel and said to contain a summary of the analysis performed on 141 (later corrected to 153) ABM publications. The attached table shows the information provided for lines 91-115, which differs somewhat from the information provided for other publications.

- a. Please confirm that the attached table does show information that was generated for the 25 VNU publications and that you or someone you worked with generated this information and provided it to ABM counsel. If you cannot confirm, please explain precisely what information you did provide about the 25 publications.
- b. Please explain the meaning of the percentages entered in the columns labeled % 3 dg, % 5 dg, % SCF and % ADC and explain why the numbers in some rows add up to more than 100% and in other rows to less than 100%.
- c. Please confirm that the second column gives the number of issues per year for each publication. If not confirmed, please explain.
- d. Please confirm that the third column contains the number of entry points when a publication is entered in more than one postal facility and explain the meaning of the expression "dyn" in some rows.

- e. Please confirm that the numbers in the fourth column express the value of the sack minimum parameter that was used in generating the presort for each publication. If not confirmed, please explain.
- f. Please indicate the actual number of pieces per sack and pieces per pallet for each of the 25 publications.
- g. Please indicate for which of the 25 publications you assumed machinability for the purpose of determining the postage under the proposed rates and the criteria you used to determine machinability.
- h. Please confirm that, having deleted the mail.dat files used, you are no longer capable of replicating the numbers shown in the attached table and the corresponding entries in your Exhibit LB-1. If not confirmed, please provide the data from which the numbers can be replicated.

Attachment to TW et al./ABM-T2-10

Publication	Frq	Entry Pts	MAILED	Sack Min Now	pc wt	ad %	Plts	Sacks	% 3 dg	% 5 dg	% SCF	% ADC	1 issue Postage '04	1 issue Postage IF	Change	Annual Cost
91	48	19	22,193	20	0.350	54%	4	419	36.4%	50.5%	22.8%	22.6%	\$6,313	\$6,418	1.7%	\$5,040
92	12		62,265	20	0.460	19%	42	398	44.0%	55.4%	0.0%	0.0%	\$18,501	\$20,355	10.0%	\$22,248
93	12		14,864	24	0.220	40%	0	314	58.6%	29.2%	0.0%	0.0%	\$4,255	\$4,767	12.0%	\$6,144
94	7		24,833	24	0.400	55%	4	415	40.6%	53.0%	0.0%	0.0%	\$8,717	\$9,227	5.9%	\$3,570
95	12		17,139	24	0.160	51%	0	398	71.5%	18.6%	0.0%	0.0%	\$5,012	\$5,631	12.4%	\$7,428
96	12		30,405	24	0.300	59%	0	684	45.0%	48.9%	0.0%	0.0%	\$9,816	\$10,832	10.4%	\$12,192
97	51	17	11,986	6	0.550	30%	0	709	49.8%	26.9%	21.6%	0.0%	\$3,864	\$5,008	29.6%	\$58,344
98	45	19	16,760	20	0.370	49%	1	352	45.0%	41.6%	18.5%	24.3%	\$4,934	\$4,971	0.7%	\$1,665
99	24		55,699	20	0.240	36%	7	787	38.1%	57.5%	13.6%	4.3%	\$13,853	\$14,062	1.5%	\$5,016
100	22		30,523	24	0.230	46%	4	486	33.1%	51.7%	0.0%	0.0%	\$8,206	\$8,940	8.9%	\$16,148
101	12	Dyn	30,204	24	0.620	38%	32	274	33.5%	57.6%	22.1%	9.7%	\$10,271	\$10,403	1.3%	\$1,584
102	15	Dyn	71,904	20	0.570	64%	71	215	44.1%	48.4%	9.4%	12.9%	\$26,614	\$25,977	-2.4%	-\$9,555
103	13	2	22,398	20	0.360	45%	0	664	60.1%	26.5%	14.9%	14.5%	\$6,897	\$12,311	78.5%	\$70,382
104	13		49,452	24	0.390	58%	10	820	63.6%	32.9%	0.0%	0.0%	\$17,987	\$29,789	65.6%	\$153,426
105	12		25,969	24	0.600	65%	7	477	61.2%	24.0%	0.0%	0.0%	\$11,895	\$12,151	2.2%	\$3,072
106	15		36,300	24	0.530	60%	27	345	49.4%	47.3%	0.0%	0.0%	\$14,608	\$15,242	4.3%	\$9,510
107	12		40,992	24	0.410	54%	22	386	37.0%	58.3%	0.0%	0.0%	\$14,055	\$14,691	4.5%	\$7,632
108	12		50,480	24	0.270	51%	11	645	38.1%	58.9%	0.0%	0.0%	\$15,004	\$15,853	5.7%	\$10,188
109	12	Dyn	30,047	24	0.580	57%	26	380	61.4%	32.1%	14.5%	12.6%	\$11,500	\$11,768	2.3%	\$3,216
110	20	Dyn	121,540	20	0.280	51%	53	647	18.5%	63.7%	15.1%	19.3%	\$30,516	\$30,423	-0.3%	-\$1,860
111	12		17,805	24	0.570	53%	3	393	64.3%	22.2%	0.0%	0.0%	\$7,331	\$7,737	5.5%	\$4,872
112	12		63,938	20	0.350	37%	8	1,105	48.4%	45.2%	0.0%	0.0%	\$19,126	\$20,577	7.6%	\$17,412
113	44	3	8,019	6	0.220	48%	4	406	24.8%	40.5%	32.8%	0.0%	\$1,917	\$3,078	60.6%	\$51,084
114	13	Dyn	73,238	20	0.560	58%	138	203	30.9%	58.0%	22.4%	13.4%	\$24,297	\$25,722	5.9%	\$18,525
115	11		42,012	24	0.310	54%	13	583	40.1%	52.9%	0.0%	0.0%	\$13,142	\$22,960	74.7%	\$107,998