

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

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

Docket No. C2004-1

SECOND SET OF INTERROGATORIES OF TIME WARNER INC. ET AL.
TO AMERICAN BUSINESS MEDIA WITNESS CAVNAR
(TW ET AL./ABM-T1-9)
(September 30, 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 interrogatory 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/ _____
John M. Burzio
Timothy L. Keegan

COUNSEL FOR
TIME WARNER INC.

Burzio & McLaughlin
Canal Square, Suite 540
1054 31st Street, N. W.
Washington, D. C. 20007-4403
Telephone: (202) 965-4555
Fax: (202) 965-4432
E-mail: burziomclaughlin@covad.net

**SECOND SET OF INTERROGATORIES
OF TIME WARNER INC. ET AL. TO WITNESS CAVNAR (ABM-T-1)**

TW et al./ABM-T1-9 Please refer to your testimony at p. 1, ll. 2-3, where you state that "American Business Media members publish approximately 1,500 business-to-business and professional periodicals."

- a. Is it your belief that these periodicals are predominantly sent to recipients who are engaged in business or the professions on a for-profit basis? If your answer is other than "yes," please state your belief or best estimate as to the approximate proportion and indicate what you base it on.
- b. Do you agree that the recipients of periodicals published by ABM members relating to the business or profession in which they are engaged on a for-profit basis value these publications primarily as an aid to the successful pursuit of that business or profession? If not, please explain the basis of any disagreement.
- c. Do you agree that most periodicals published by ABM members face competition from other publications (whether or not published by ABM members) that are in some respects similar to themselves? If not, please explain the basis of any disagreement and provide your best estimate of the proportion of periodicals published by ABM members that face such competition.
- d. What proportion of periodicals published by ABM members are "requester" (or "controlled circulation") Periodicals? If you do not know, please provide your best estimate and indicate what you base it on.