

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

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

Docket No. C2004-1

ERRATUM TO FOLLOW-UP INTERROGATORY OF TIME WARNER INC. ET AL.
TO AMERICAN BUSINESS MEDIA WITNESS
BRADFIELD (TW ET AL./ABM-T2-10)
(October 1, 2004)

On September 30, 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.) filed a "Follow-Up Interrogatory . . . to American Business Media Witness Bradfield (TW et al./ABM-T2-10)," in which the text of the interrogatory was incorrectly numbered "TW et al./ABM-T3-10."

A corrected copy of the relevant page is appended hereto.

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

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

TW et al./ABM-T2-10 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.