

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 AND REQUESTS
FOR PRODUCTION OF DOCUMENTS OF TIME WARNER INC. ET AL.
TO THE NATIONAL NEWSPAPER ASSOCIATION (TW ET AL./NNA-1-4)
(July 27, 2004)

Pursuant to sections 25 and 26 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 and requests for production of documents to the National Newspaper Association (NNA).

Time Warner Inc. et al. request that, in responding to these requests, NNA follow the guidelines set out below.

With respect to each question and subpart thereof, if information is not available in the exact format or level of detail requested, please provide responsive material in such different format or level of detail as is available. If NNA is unable to provide current information, please provide the most recent information available and identify the date or period to which that information applies. If NNA is unable to provide complete information, please provide any partial or representative information available that is responsive to the question. If NNA objects to providing any requested information on grounds of confidentiality or commercial or other privilege, please provide the requested information in a coded or blind format to the

extent that it is possible to do so consistent with the asserted privilege, or contact undersigned counsel to discuss possible limitations or alternative requests.

Respectfully submitted,

s/ _____
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**FIRST SET OF INTERROGATORIES FROM TIME WARNER INC. ET AL.
TO THE NATIONAL NEWSPAPER ASSOCIATION**

TW et al./NNA-1 Please provide a list of NNA members and a list of the publications owned or published by each member or its affiliates, identifying the city or town in which each publication has its office of publication.

TW et al./NNA-2 Please confirm that, as stated (as of July 21, 2004) on NNA's website, www.nna.org: "NNA has a major new initiative to digitize community newspaper archives and make them accessible over the Internet. Participating papers will receive revenues from the subscriptions."

TW et al./NNA-3 Please confirm that NNA's website contains (or contained as of July 21, 2004) an item captioned "Pub Aux changes frequency, distribution," which states in part:

"For 139 years, Publishers' Auxiliary readers have looked to 'the newspaper industry's oldest newspaper' for the latest in industry news, changes in postal and governmental policies affecting newspapers, association news, and classified and display advertising. In the near future, readers will depend on Pub Aux for all those features, but they now get them electronically and in print, and with increased frequency.

"On July 1, 2001, National Newspaper Association members and Pub Aux subscribers started receiving a weekly e-mail digest called Electronic Pub Aux and an enhanced monthly print edition of Publishers' Auxiliary.

"Under the new publication schedule, subscribers receive Electronic Pub Aux on Thursdays containing a news digest of the latest industry and national news affecting newspapers, with links to original sources for those wanting to read more. Readers get the latest news and information from NNA on new programs and member benefits. "

TW et al./NNA-4 Please confirm that NNA's website contains (or contained as of July 21, 2004) an item captioned "National Newspaper Association Welcomes MediaNews Group's Community Newspapers," which states in part:

"MediaNews Group, with corporate offices in Denver, is one of the largest newspaper companies in the United States, with papers situated throughout California, the Rocky Mountain region and the Northeast. The company is privately owned and operated. Each of its newspapers maintains a web site focused on local news content. These web sites are hosted by MediaNews Group Interactive and are aggregated along with its content under the umbrella site www.newschoice.com."