

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 MCGARVY
(TW ET AL./ABM-T3-1-7)
(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 McGarvy (ABM-T-3).

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 McGarvy 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 MCGARVY (AMB-T-3)**

TW et al./ABM-T3-1. Please provide a list of all Crain Communications 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-T3-2. 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 Crain Communications publications? If the answer 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-T3-3. Please provide a recent representative mail.dat file for each Crain Communications publication.

TW et al./ABM-T3-4.

- a. Who performs the presort for Crain Communications 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-T3-5. Please identify the printer and the printer's location for each Crain Communications publication.

TW et al./ABM-T3-6. On page 1, line 8, you state: "It appears to me, however, that the Time Warner restructuring proposal—especially with the rates suggested but not directly at issue here—is too much, too fast." Please indicate, based on your

experience in MTAC and POAC, how long the Postal Service and the mailing industry have been exploring cost-based rates.

TW et al./ABM-T3-7. Please refer to page 8, line 14, of your testimony. Are there publishers who allow their printer and or fulfillment house to perform analysis on their distribution and make recommendations on "how best to 'package' a mailing"?