

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

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

Docket No. C2004-1

MOTION OF AMERICAN BUSINESS MEDIA TO ADMIT
DIRECT TESTIMONY, WRITTEN-CROSS EXAMINATION AND
POIR RESPONSE OF AMERICAN BUSINESS MEDIA
WITNESS LOU BRADFIELD
(ABM-T2)
(November 3, 2004)

In accordance with Order No. 2004-1/14, American Business Media hereby moves that the following direct testimony and written cross-examination of Lou Bradfield be made part of the evidentiary record in this docket:

- (1) Direct Testimony dated September 9, 2004
- (2) Designations of Written Cross-Examination of the following responses:
T2-1-2, 4-8, 10
- (3) Response to POIR No. 3 and Correction of Exhibit LB-1.

American Business Media will provide to the Commission an original, signed declaration attesting to the authenticity, accuracy, and admissibility of the written direct testimony and written responses Mr. Bradfield has provided as soon as it becomes available. An unsigned version of this declaration is attached.

Respectfully submitted,

/s/ David R. Straus

David R. Straus

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November 5, 2004

POSTAL RATE COMMISSION

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DECLARATION

I, Lou Bradfield, hereby declare under penalty of perjury that:

The *Direct Prepared Testimony of Lou Bradfield on Behalf of American Business Media*, denominated ABM-T2, was prepared by me or under my direction;

Were I to give this testimony orally before the Commission, it would be the same (except that I submitted a corrected exhibit LB-1 in response to POIR No. 3).

The interrogatory responses and responses to the Presiding Officer's Information Request filed under my name were prepared by me or under my direction; and

Were I to respond orally to the questions appearing in the interrogatories and in the Information Request, my answers would be the same.

Lou Bradfield

Date