

BEFORE THE  
POSTAL RATE COMMISSION  
Washington, DC 20268-0001

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Complaint of Time Warner et al.	)	Docket No. C2004-1
Concerning Periodicals Rates	)	

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ERRATA TO INITIAL BRIEF OF  
NATIONAL NEWSPAPER ASSOCIATION, INC. (NNA)

The Initial Brief of National Newspaper Association filed December 27, 2004, contained a paragraph that was altered in the conversion of original drafts to the final. NNA supplies the corrected text below.

<u>Page</u>	<u>Change</u>	<u>To</u>
18	Entire paragraph	He offers a faint hope of the Internet's viability as an alternative to the mailstream, but discusses websites that are tied to publications. (Witness O'Brien cites a publication that says if it cannot support its printed product, it will continue in another format, such as a newsletter or Website, Tr. 5/1442, but that single example is not only a hard-to-find anecdote—that publisher evidently hasn't yet tried survival in the Internet only world and who knows if he would be successful in that migration.)

NNA regrets the inconvenience to the parties.

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1 all outside the scope of the large publications he represents. He simply assumes  
2 that whatever he personally wants to know will appear on the Internet. Tr.3/716.

3  
4 Yet oddly he seems to assume that the reliability of information on the  
5 Internet depends upon a reliable print publication's own website being available  
6 there. Tr. 3/737. If the publication itself ceases to exist, he cannot demonstrate  
7 that the website flowing from it would continue—and it is folly to think that it  
8 would. He is concerned about an overconcentration of media ownership, Tr. 3/  
9 757. but seems unconcerned that his testimony would affect the smaller  
10 publications that help to stave off such a force.

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12 Furthermore, he has a touching naiveté about the economics in  
13 publications' Internet websites for one who has written extensively on business  
14 and markets. Tr. 3/611, 612, 746. He recognizes that advertising support is  
15 critical, and that ad-zapping is a phenomenon of the new technologies. Tr. 3/  
16 753-54. He understands that factual information costs more than opinions, Tr. 3/  
17 749. But he doesn't appear to understand that if advertising isn't available, the  
18 factual information he expects to see on the web is likely to come crashing down  
19 if the underlying publication cannot support it.

20  
21 He offers a faint hope of the Internet's viability as an alternative to the  
22 mailstream, but discusses websites that are tied to publications. (Witness O'Brien  
23 cites a publication that says if it cannot support its printed product, it will continue in  
24 another format, such as a newsletter or Website, Tr. 5/1442, but that single example  
25 is not only a hard-to-find anecdote—that publisher evidently hasn't yet tried survival  
26 in the Internet only world and who knows if he would be successful in that migration.)

27  
28 Finally, he seems to lack a firm idea of how different parts of the  
29 American population would be affected if information were available only on the  
30 web. Tr. 3/ 744-45, but recognizes that nearly a third of the population is not  
31 online, Tr.3/784, and offers no evidence they ever will be, despite Gordon's belief