

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

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

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Docket No. C2004-1

FIRST SET OF INTERROGATORIES OF TIME WARNER INC. ET AL.  
TO AMERICAN BUSINESS MEDIA WITNESS BRADFIELD  
(TW ET AL./ABM-T2-1-9)  
(September 14, 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 Bradfield (ABM-T-2).

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 Bradfield 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/ \_\_\_\_\_  
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

**FIRST SET OF INTERROGATORIES  
FROM TIME WARNER INC. ET AL. TO WITNESS BRADFIELD (ABM-T-2)**

TW et al./ABM-T2-1. Please provide a list of all VNU 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-T2-2. 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 VNU 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-T2-3. Please provide a recent representative mail.dat file for each VNU publication.

TW et al./ABM-T2-4. On page 6, lines 15-18, you state: "But there is also no doubt that of the 25,000 or so outside-county Periodicals in the mail (Tr. 1041), a good number would be staring at increases of the type portrayed at the upper end of the range on my exhibit with no reasonable opportunity to change their mailing practices."

- a. Have you done any analysis to substantiate this claim?
- b. Have you done any analysis to determine how the increases would change if they could change their mailing behavior?
- c. Please identify how many publications is a "good number."
- d. Please identify why these publications have "no reasonable opportunity to change their mailing practices."

TW et al./ABM-T2-5. On page 8, line 27-page 9, line 2, you state: "Rather, the rates for supplemental mailings are higher because the Postal Service's costs for these smaller, less work-shared mailings are higher, and the cost based rates in effect today reflect those cost differences." What percentage of the cost differences are actually reflected in the rates that are in effect today?

TW et al./ABM-T2-6.

- a. Who performs the presort for VNU 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-T2-7. On page 14, lines 14 - 16 you state: "For another, the ability to make four 20,000 circulation publications look for postal purposes like one 80,000 publication is unlikely to lead to substantial improvement in the ability to avoid sacks and the worst of the proposed rates." Please provide all mail.dat files and analyses that you have conducted to reach this conclusion.

TW et al./ABM-T2-8. On page 5 you describe a study of 144 publications, belonging to five ABM member organizations. The exhibit at the end of your testimony summarizes the results. A single Excel file, containing four worksheets, each presenting summaries of results for certain publications, whose numbers add up to 144, was provided to Time Warner Inc. et al. by ABM.

- a. Please describe your own role in carrying out this study, both with regard to VNU owned publications and those owned by other organizations.

- b. If you did not personally perform the analysis of VNU publications in this study, who did?
- c. If you did not personally coordinate the effort to summarize the analysis into the exhibit shown in your testimony, who did?
- d. If you did not personally coordinate the effort to produce the Excel file mentioned above, who did?
- e. How many VNU owned publications are included in the set of 144, and how were they selected from among all VNU publications? Please identify the VNU publications that were studied.
- f. Please confirm that Crain Communications was one of the other media organizations whose publications were analyzed in this study.
- g. Please identify the other ABM organizations whose publications were analyzed in this study.
- h. Please confirm that the analysis involved the creation, for each publication, of one Excel spreadsheet, into which were copied results from an Access program provided by Complainants. Please provide a copy of each such Excel spreadsheet (the identities of particular publishers and publications may be masked, and/or materials may be submitted subject to the terms of the existing Nondisclosure Agreement between ABM and Time Warner Inc. et al, dated August 27, 2004).

- i. Please provide the mail.dat files used in the analysis (the identities of particular publishers and publications may be masked, and/or materials may be submitted subject to the terms of the existing Nondisclosure Agreement between ABM and Time Warner Inc. et al, dated August 27, 2004).

TW et al./ABM-T2-9. Please provide the following information, to the extent that it can be extracted from mailing statements, mail.dat files or any other available sources, for each VNU publication that is mailed under Periodicals rates.

- (1) frequency of publication;
- (2) average mailed volume per issue;
- (3) average weight per piece;
- (4) average total print order per issue
- (5) printer and Zip code where printed;
- (6) percent at each presort level (carrier route, 5-digit, 3-digit and basic).
- (7) for each presort level, the percent that is pre-barcoded;
- (8) percent qualifying for each per-piece discount provided under current rates;
- (9) percent that is palletized;
- (10) percent editorial content;
- (11) percent of advertising pounds entered in each zone;
- (12) average number of pieces per bundle;
- (13) for sacked pieces, average number of pieces per sack;
- (14) for palletized pieces, average number of pieces per pallet
- (15) the minimum number of pieces per sack, as currently set for this publication in the fulfillment program used.