RECEIVED

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

Jan 19 | 25 PM '00

POSTAL RATE COMMISSION OFFICE OF THE SECRETARY

Postal Rate and Fee Changes, 2000

÷

) Docket No. R2000-1

NOTICE OF INTERVENTION OF AMERICAN BUSINESS PRESS

Pursuant to Section 20 of the Commission's Rules of Practice and Order No. 1279 issued January 14, 2000, American Business Press (ABP) hereby notices its intervention as a full participant in the above-captioned docket.

ABP is an association of the nation's leading publishers of business, professional and medical periodicals, which are mailed almost exclusively at the regular Periodicals rates. ABP members publish more than 1,000 periodicals and pay roughly \$200,000,000 in Periodicals postage alone. They also use substantial amounts of First-Class and Standard A mail, but the focus of ABP's participation in this docket will be the enormous increase proposed for Periodicals, which will compund significant increases for nearly all ABP members in the reclassification case, Docket No. MC95-1, and in R97-1. While the Postal Service claims that the average increase requested for outside of county Periodicals in this proceeding is 12.7%, our calculations and the calculations of others indicate that the vast majority of Regular Rate periodicals will suffer increases of about 14%-15.5%, which should be obvious from the percentage increases in the individual rate cells.¹ The attached charts prepared by an ABP member show mailing characteristics for four Periodicals with circulations of 13,275, 30,816,

¹ It appears that the only Regular Rate Periodicals experiencing increases under the proposed rates anywhere near the claimed average are those that are not barcoded.

86,034 and 105,594 that are typical of the business press in terms of size and billing

determinants. The increases shown there are 14.77%, 14.41%, 14.70%, 14.83% respectively.²

I.

ABP requests that the following name included on the service list in this docket:

David R. Straus Thompson Coburn LLP 700 14th Street, NW Suite 900 Washington, D.C. 20005-2010 Phone: (202) 508-1003 Facsimile: (202)508-1010 Email: <dstraus@thompsoncoburn.com>

II.

ABP requests a hearing on this matter and intends to participate in this proceeding.

Respectfully submitted,

Traus Dayid R. Straus

Attorney for American Business Press

Law Offices of:

Thompson Coburn LLP 700 14th Street, N.W. Washington, D.C. 20005-2010 202-508-1000

January 19, 2000

² Another member calculated the increases for 11 publications. One showed an increase of 12.9%, but the other 10 ranged from 14.3% to 15.5%, averaging just over 15%.

CERTIFICATE OF SERVICE

I hereby certify that I have this 19th day of January, 2000 served the foregoing

document upon all of the participants in accordance with Section 12 of the Rules of Practice.

trans

David R. Straus

Law Offices of:

Thompson Coburn LLP 700 14th Street, N.W. Washington, D.C. 20005-2010 202-508-1000