

**BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON DC 20268-0001**

RECEIVED

JUN 29 4 14 PM '00

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

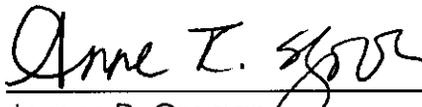
)
) Docket No. R2000-1
)
)

**RESPONSE OF MAGAZINE PUBLISHERS OF AMERICA, INC.
WITNESS COHEN TO SECOND SET OF INTERROGATORIES
OF THE UNITED STATES POSTAL SERVICE
(USPS/MPA-T1-9)**

(JUNE 29, 2000)

Magazine Publishers of America, Inc. hereby provides the response of witness Cohen to the following interrogatory of the United States Postal Service: USPS/MPA-T1-9, filed on June 15, 2000. Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,



James R. Cregan
Anne R. Noble
Counsel
Magazine Publishers of America, Inc.
Suite 610
1211 Connecticut Avenue NW
Washington DC 20036
(202) 296 7277

**UNITED STATES POSTAL SERVICE
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO
MAGAZINE PUBLISHERS OF AMERICA WITNESS COHEN
(USPS/MPA-T-1-9)**

USPS/MPA-T-1-9. What are the Periodicals associations and industry doing to ensure that the proposed makeup requirements changes, such as L001 and combining auto and non in the same container, are being publicized to the entire range of Periodical mailers so they are prepared for implementation?

Response:

Periodicals associations are working in three areas to ensure that the proposed makeup requirement changes are publicized to the entire range of Periodicals mailers. First, the associations are publicizing these changes to their own members. In particular, MPA has had extensive discussions about the proposed changes at meetings of our Postal Committee and will supplement these discussions with notification to the entire membership when the final rules are promulgated. Also, I am informed that American Business Media's (ABM) Postal Counsel regularly sends emails to more than 100 representatives of member companies regarding changes in mail preparation requirements. He has also advised them of the importance of implementing the proposed makeup requirement changes to joint Postal Service/Periodicals Industry efforts to reduce the rate increase for Periodicals mailers. I am also informed that the National Newspaper Association (NNA) is planning a session at its October conference to discuss key elements of the rate case including changes in mail preparation standards.

Second, Periodicals associations routinely and actively participate in panel discussions regarding mail preparation changes such as these at postal conferences, such as the Graphic Communication Association's (GCA) Addressing and Distribution Conference and PostCom's Postal Policy and Operations Conference, joint regional MPA/ABM magazine conferences and MTAC Work Group meetings. Representatives of many large and small publishers and suppliers to publishers attend these events. These suppliers include printers, fulfillment bureaus, and software providers. While it is certainly possible that publishers who do not belong to a Periodicals association do not attend these conferences, many of the suppliers that do attend serve a large number of Periodicals clients. Educating these suppliers about mail preparation changes serves dual

purposes. First, these suppliers can be expected to inform and explain the changes to their clients. These suppliers use a variety of methods to educate their clients on mail preparation changes, such as the ones currently being proposed, including newsletters and other written and verbal communication. Second, some smaller publishers do not handle the more detailed aspects of mail preparation themselves but rely on their suppliers to understand and implement mail preparation changes on their behalf.

Third, Periodicals associations are updating their educational materials regarding mail preparation to reflect the proposed makeup requirement changes. For example, I am told that NNA is planning to publish an update to its Mail Preparation Handbook. Furthermore, Max Heath, chairman of the NNA Postal Committee, has already written an article about the Line-of-Travel (LOT) requirement in NNA's *Publisher's Auxiliary*, a publication sent to at least 6,000 publishers, editors, and their staff nationwide. I expect that Mr. Heath will write additional articles about mail preparation changes in his regular column in the *Publisher's Auxiliary*.

Equally important to the success of the proposed makeup requirement changes are the Postal Service's own educational efforts. These efforts include discussing the changes at conferences, at the Postal Forum, which is attended by many unaffiliated publishers, MTAC meetings, and Focus Groups as well as publishing articles about the changes in the *Postal Bulletin*, *Mailers Companion*, and *Memo to Mailers*.

DECLARATION

I, Rita D. Cohen, declare under penalty of perjury that the foregoing answers are true and correct to the best of my knowledge, information and belief.

Rita D. Cohen

Date: June 29, 2000

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with the Commission's Rules of Practice.


Anne R. Noble

Washington, D.C.
June 29, 2000