

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

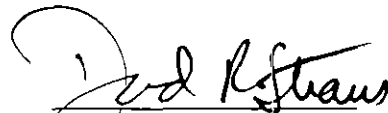
POSTAL RATE AND FEE CHANGES, 1997

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Docket No. R97-1

THE AMERICAN BUSINESS PRESS' FIRST SET OF
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF
DOCUMENTS DIRECTED TO USPS WITNESS THRESS
(ABP/USPS-T-7-1-4)

Pursuant to Sections 25 and 26 of the Commission's Rules of Practice, the American Business Press hereby submits the attached interrogatories and requests for production of documents to USPS Witness Thress (ABP/USPS-T-7-1-4). If the designated witness is unable to respond to any interrogatory, we request a response by some other qualified witness.

Respectfully submitted,



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Counsel for the American
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August 20, 1997

FIRST INTERROGATORIES AND REQUEST
FOR PRODUCTION OF DOCUMENTS
OF AMERICAN BUSINESS PRESS (ABP)
TO USPS WITNESS THOMAS THRESS (USPS-T-7)
ABP/USPS-T-7-1-4

ABP/USPS-T-7-1

At page 46, line 16 you state that "the price of postage represents a relatively minor component of the total cost of preparing and delivering a periodical." Provide (or, if voluminous, merely identify) all information and data on which you relied, and, if not relied upon, all information and data of which you are aware that are relevant to this statement.

ABP/USPS-T-7-2

In your testimony at page 46 and your testimony at page 44, lines 14-16, you seem to assume that subscribers pay for all periodicals sent through the mail. Are you aware that periodicals can qualify for the periodicals rate if they are sent to subscribers who request, but do not actually pay for, them? How, if at all, would recognition and inclusion of this fact change your testimony?

ABP/USPS-T-7-3

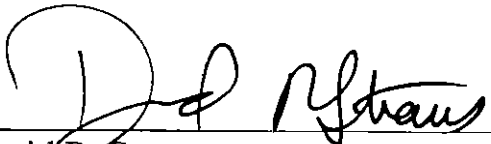
You claim, at page 46, that changes in postage would have a "relatively modest impact on subscription rates." Would that statement be equally true if the rates proposed by Postal Service witness Bernstein were implemented?

ABP/USPS-T-7-4

In terms of the impact of increases in postage rates for periodicals, and with respect to periodicals where there is no monetary payment by the subscriber, what impact would you examine (because there is no subscription rate).

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing documents in accordance with Section 12 of the Commission's Rules of Practice.



David R. Straus
Stephen M. Feldman

Dated: August 20, 1997