

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

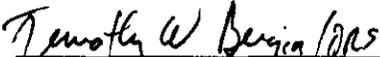
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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

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POSTAL RATE AND FEE CHANGES, 2001 )  
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Docket No. R2001-1

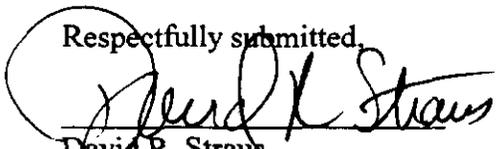
FIRST INTERROGATORIES AND REQUESTS FOR PRODUCTION OF  
DOCUMENTS OF AMERICAN BUSINESS MEDIA AND  
THE MCGRAW-HILL COMPANIES DIRECTED TO USPS  
(ABM/USPS-1-8)

Pursuant to the Commission's Rules of Practice, American Business Media and The McGraw-Hill Companies, Inc. hereby submit the attached interrogatories and requests for production of documents to the Postal Service (ABM-MH/USPS-1-8). They deal with matters related to the testimony of several witnesses. We request that a designated representative respond to the interrogatories.

  
\_\_\_\_\_  
Timothy W. Bergin  
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Companies, Inc.

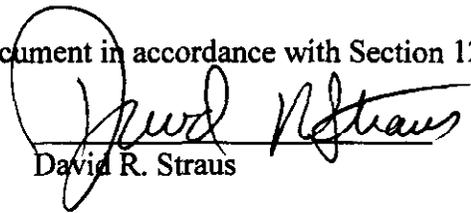
Respectfully submitted,

  
\_\_\_\_\_  
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Counsel for American Business Media

CERTIFICATE OF SERVICE

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

  
\_\_\_\_\_  
David R. Straus

Dated: November 21, 2001

**FIRST INTERROGATORIES AND REQUESTS FOR PRODUCTION OF  
DOCUMENTS OF AMERICAN BUSINESS MEDIA AND THE  
MCGRAW-HILL COMPANIES DIRECTED TO USPS  
(ABM-MH/USPS-1-8)**

**ABM-MH/USPS-1.** Please provide all studies conducted by or on behalf of the Postal Service since 1995 that analyzed or considered in any way separate editorial drop ship pound rates for Periodicals. If the USPS has not studied these issues since 1995, please so state.

**ABM-MH/USPS-2.** Please provide all studies conducted by or on behalf of the Postal Service since 1995 that analyzed or considered in any way a per-piece pallet discount for Periodicals. If the USPS has not studied these issues since 1995, please so state.

**ABM-MH/USPS-3.** Please provide all studies conducted by or on behalf of the Postal Service since 1995 that analyzed the particular characteristics of periodicals publications and/or Periodicals mailers who drop ship. Possible characteristics studied might include publication circulation or density, time sensitivity or other factors. If the USPS has not studied these issues since 1995, please so state.

**ABM-MH/USPS-4.** Please provide all studies conducted by or on behalf of the Postal Service since 1995 that analyzed the particular characteristics of Periodicals publications and/or Periodicals mailers who do not drop ship. Possible characteristics studied might include publication circulation or density, time sensitivity or other factors. If the USPS has not studied these issues since 1995, please so state.

**ABM-MH/USPS-5.** Please provide all studies conducted by or on behalf of the Postal Service since 1995 that analyzed or considered in any way co-palletizing in which different Periodicals are combined in a single pallet. If the USPS has not studied these issues since 1995, please so state.

**ABM-MH/USPS-6.** Please provide all studies or estimates available to the USPS of the number of Periodicals and the number of pieces for each such Periodical that are not now drop shipped but will begin to be drop shipped in response to the USPS's proposed editorial drop ship pound rate in Periodicals. If the USPS has not studied this issue, please so state.

**ABM-MH/USPS-7.** Please provide all studies or estimates available to the USPS of the number of Periodicals and the number of pieces for each such Periodical that are not now mailed on pallets but will begin to be mailed on pallets in response to the USPS's proposed per piece pallet discount in Periodicals. If the USPS has not studied this issue, please so state.

**ABM-MH/USPS-8.** Please provide all studies or estimates available to the USPS of the number of Periodicals and the number of pieces for each such Periodical that are neither drop-shipped nor entered on pallets at present but that will begin to be both drop shipped and entered on pallets in response to the combined effects of the USPS's proposed editorial drop ship and per piece pallet discount in Periodicals. If the USPS has not studied these issues in combination, please so state.