

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

RECEIVED
DEC 28 1 31 PM '01
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Postal Rate and Fee Changes, 2001)

Docket No. R2001-1

ANSWER OF
ALLIANCE OF NONPROFIT MAILERS
AMERICAN BUSINESS MEDIA
AOL TIME WARNER INC.
DOW JONES & COMPANY, INC.
MAGAZINE PUBLISHERS OF AMERICA, INC.
THE MCGRAW-HILL COMPANIES, INC. AND
NATIONAL NEWSPAPER ASSOCIATION
IN SUPPORT OF "JOINT PARTIES" PROCEDURAL MOTION

(December 28, 2001)

The Alliance of Nonprofit Mailers, American Business Media, AOL Time Warner Inc., Dow Jones & Company, Inc., Magazine Publishers of America, Inc., The McGraw-Hill Companies, Inc., and National Newspaper Association (collectively "Periodicals Coalition") hereby respond in support of the December 26, 2001 "Motion of Joint Parties to Suspend Hearings Pending Adoption of Procedures for Processing Proposed Stipulation and Agreement."

As well-stated by Joint Parties, the filing of a proposed settlement agreement, as revised by the Postal Service on December 26, 2001, that appears to have the overwhelming support of the parties to this case presents sufficient grounds for the Commission to delay the immediately pending cross-examination in the hope and expectation that such cross-examination will prove to be unnecessary. It would make no sense, would be a terrible waste of resources and could be counter-productive to the development of this record for parties supporting the settlement rates *for settlement purposes only* to have thrust upon them the obligation to attack those same rates or classifications in cross-examination of Postal Service witnesses in order to protect their interests in the unlikely event that an insufficient number of parties agree to the stipulation.

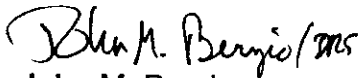
For these reasons and the reasons set forth in the Joint Parties' motion, the Periodicals Coalition urges the Commission to grant that motion and allow reasonable settlement procedures to commence.

Respectfully submitted,



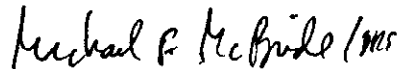
David M. Levy
Sidley Austin Brown & Wood
1722 Eye Street, N.W.
Washington, D.C. 20006-3704

Counsel for
ALLIANCE OF NONPROFIT MAILERS



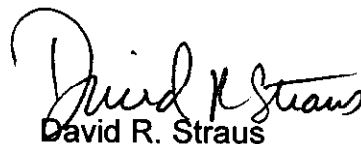
John M. Burzio
Timothy L. Keegan
Burzio & McLaughlin
Canal Square, Suite 540
1054 31st Street, N. W.
Washington, D.C. 20007-4403

Counsel for
AOL TIME WARNER INC.



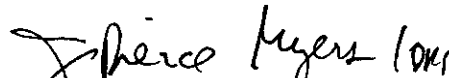
Michael F. McBride
John W. Lawrence
LeBoeuf, Lamb, Greene & MacRae, LLP
1875 Connecticut Ave., N.W.
Suite 1200
Washington, D. C. 20009-5728

Attorneys for
DOW JONES & COMPANY, INC.



David R. Straus
Thompson Coburn
Suite 600
1909 K Street, N.W.
Washington, D.C. 20006

Counsel for
AMERICAN BUSINESS MEDIA



James Pierce Myers
Attorney at Law
1617 Courtland Road
Alexandria, VA 22306

Counsel for
MAGAZINE PUBLISHERS OF AMERICA, INC.



Tonda F. Rush
King & Ballow
P.O. Box 50301
Arlington, VA 22205

Counsel for
NATIONAL NEWSPAPER ASSOCIATION

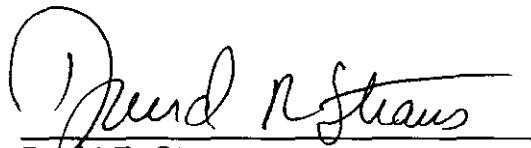
Timothy W. Bergin / TMB

Timothy W. Bergin
Squire, Sanders & Dempsey L.L.P.
1201 Pennsylvania Ave., N.W.
P.O. Box 407
Washington, D.C. 20044-0407

Counsel for
THE MCGRAW-HILL COMPANIES, INC.

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 Rule 12 of the rules of practice.



David R. Straus

December 28, 2001