# 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

Docket No. R97-1

# RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS THRESS TO INTERROGATORY OF THE AMERICAN BUSINESS PRESS (ABP/USPS-T7-5)

The United States Postal Service hereby provides the response of witness

Thress to the following interrogatory of the American Business Press: ABP/USPS–

T7—5, filed on September 5, 1997.

The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr. Chief Counsel, Ratemaking

Eric P. Koetting

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 (202) 268–2992; Fax –5402 September 19, 1997

# RESPONSE OF POSTAL SERVICE WITNESS THRESS TO INTERROGATORIES OF ABP

<u>ABP/USPS-T7-5</u>. In response to ABP/USPS-T7-3, you calculated an assumed subscription price increase of 16% for a periodical with a subscription price of \$1.50 per issue and were unwilling to state whether a 16% price increase would be "modest." Assume a subscription price of \$.75 and a resulting price increase of 32%. Are you able to offer an opinion on whether a 32% price increase is modest, or is that, too, "ultimately subjective"?

#### RESPONSE:

I would not consider a 32% price increase to be modest, although I would still maintain that the term "modest" is, by definition, a subjective one. For example, one could look at this scenario and evaluate the price increase purely in terms of dollar amount and conclude that a 24¢ price increase is modest. As I indicated in my response to ABP/USPS-T7-3, the only thing that I can state with certainty is that the price increase proposed by the Postal Service for Periodical regular mail in this case is more modest than the price increase implied by Mr. Bernstein's Ramsey prices.

### DECLARATION

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

(Signed)

9-18-97 (Date)

## **CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

Eric P. Koetting

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 September 19, 1997