

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

**EXPERIMENTAL PERIODICALS  
CO-PALLETIZATION DROPSHIP  
DISCOUNTS FOR HIGH EDITORIAL  
PUBLICATIONS, 2004**

**Docket No. MC2004-1**

**NOTICE OF INTERVENTION  
BY THE  
AMERICAN POSTAL WORKERS UNION, AFL-CIO**

**(March 17, 2003)**

The American Postal Workers Union, AFL-CIO (APWU) submits this Notice of Intervention pursuant to Section 20 of the Rules of Practice and Commission Order No. 1392. As required and requested the APWU states:

1. Documents relating to the above-captioned proceedings should be served upon:

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2. APWU communicates with its members through high editorial content publications using periodical rates. APWU bargaining unit members accept, process, and distribute periodicals.
3. APWU will participate fully in any proceedings.
4. APWU does not intend to request a hearing, but would fully participate in any scheduled hearing.
5. APWU supports the Postal Service's request for treatment under Commission rules 67-67d.
6. The APWU opposes the Postal Service's request to incorporate materials from Docket No. R2001-1 to satisfy the filing requirements in the Commission's Rules of Practice and Procedure, but supports the Postal Service's motion for waiver of those filing requirements. As President Burrus explained in his February 13, 2004 letter concerning Docket No. C2004-1, it is impossible to make a reasonable estimate of the impact of proposed changes using R2001-1 rate case data and assumptions. Given the circumstances of this experimental offering judgements about impacts will be highly speculative, but in every scenario impacts should be minor.
7. In the "Statement of American Postal Workers Union, AFL-CIO Concerning Settlement" in MC2002-3 supporting the settlement, APWU expressed a reservation that the co-palletization dropship discounts would only benefit larger periodical mailers. APWU supports efforts to extend better rates to smaller periodical mailers, however, as with all worksharing offerings, APWU is concerned that the products and services be appropriately priced.

Respectfully submitted,

Arthur M. Luby  
Counsel for  
American Postal Workers Union, AFL-CIO

## CERTIFICATION

I hereby certify that I have this date served the foregoing document in accordance with the rules of practice

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