

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

RESPONSE OF UNITED STATES POSTAL SERVICE
TO MOTION OF AMERICAN BUSINESS MEDIA TO COMPEL RESPONSES
TO INTERROGATORIES ABM/USPS-T1-11 and ABM/USPS-T11-13
(April 8, 2004)

Pursuant to Rule 26(d) of the Commission's Rules of Practice, the United States Postal Service hereby responds to American Business Media's (ABM's) motion to compel responses to interrogatories ABM/USPS-T1-11 and ABM/USPS-T1-13, filed April 1, 2004 (Motion). Interrogatory ABM/USPS-T1-11 asks for the identity of the one printer/consolidator who provided the data for AP 9 in the first co-palletization data collection report provided under Docket No. MC2002-3. Interrogatory ABM/USPS-T1-13 asks for the identity of all printers/consolidators who were participating in the existing co-palletization program as of the end of FY 2003, and the identity of all printers/consolidators who are participating now.

The Postal Service objected on the basis of relevance and confidentiality. In its Motion to Compel, ABM argued that any claim of confidentiality should come from the mailer, rather than the Postal Service. While the Postal Service does not agree as a

general principle, it has asked the printers/consolidators who have participated in the current co-palletization experiment whether they are willing to be identified.

With respect to interrogatory ABM/USPS-T1-11, the Postal Service can now certify that it has contacted the company that provided the AP 9 data, that it has asked that company about identifying it as the provider of that data, and that the company has responded that it wishes its identity to remain confidential. Under those conditions, ABM asserted that it would not further oppose the Postal Service's objection to interrogatory ABM/USPS-T1-11. Motion at 2-3.

With respect to interrogatory ABM/USPS-T1-13, the Postal Service has communicated with all of the participants in the current co-palletization experiment. The responses so far give the Postal Service hope that it will be able to withdraw its objection to this interrogatory. But not all of the participants have provided final responses. The Postal Service will provide an update no later than next Tuesday.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

/s/

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

David H. Rubin

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2986; Fax -6187
April 8, 2004

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.

David H. Rubin

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2986; Fax -6187
April 8, 2004