

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

**Postal Rate and Fee Changes, 2005       )     Docket No. R2005-1**

**ANSWER OF AMERICAN BUSINESS MEDIA  
IN SUPPORT OF POSTAL SERVICE REQUEST FOR EXPEDITION  
(April 11, 2005)**

Pursuant to Section 21 the Commission's Rules of Practice, American Business Media hereby answers in support of the United States Postal Service's April 8, 2005 "United States Postal Service Request for Expedition and Early Consideration of Procedures Facilitating Settlement Efforts."

American Business Media wholeheartedly agrees with the Postal Service's assessment that the rate filing initiating this proceeding should be sufficiently acceptable to the vast majority of the parties to justify both strong and early settlement offers and an expedited procedural schedule. In fact, American Business Media, without having considered fully the procedural schedule proposed by the Postal Service, suggests that the proposal to cut from four weeks to three the amount of time provided for interventions could be cut by at least another week, thus advancing the prehearing conference as well. As the Postal Service stated, this rate filing has had more advance publicity than any other, including—but not limited to—the communication last week from its counsel to all parties to R2001-1.

In support of this suggestion, American Business Media refers the Commission to the practice of a sister regulatory agency, the Federal Energy Regulatory Commission (FERC). Rate increases filed by regulated electric utilities are typically filed at FERC with no advance warning, and although they are generally far less voluminous than postal rate filings, they do typically involve a substantial amount of complex data for both an historic and a future test year (and issues such as jurisdictional splits, rate of return and treatment of taxes and tax credits that are not applicable to postal rate increases).

FERC's standard practice is to provide three weeks for the filing of interventions, but unlike the simple interventions required at this agency, interventions at FERC by those opposing the rate increase must be accompanied by a protest that details complex objections, often accompanied by affidavits in support of the objections. In other words, FERC provides three weeks for parties to analyze and protest a rate filing. Here, nothing more than a statement of intent to participate is required, and especially under the circumstances addressed by the Postal Service, it would not be unreasonable to

allow two weeks for interventions, perhaps with liberally granted late intervention.<sup>1</sup>

Respectfully submitted,

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<sup>1</sup> Although American Business Media's suggestion is made in order to encourage the promptest possible efforts to arrive at a settlement, full disclosure requires the additional information that May 2<sup>nd</sup>, the day proposed by the Postal Service for a prehearing conference, falls in the middle of American Business Media's annual meeting, and the undersigned counsel would not be able to participate in a conference held May 2<sup>nd</sup> through May 4<sup>th</sup>.