

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

Postal Rate and Fee Changes,
2006

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Docket No. R2006-1

FOLLOW UP INTERROGATORY OF
MAGAZINE PUBLISHERS OF AMERICA, INC.,
AND ALLIANCE OF NONPROFIT MAILERS
TO AMERICAN BUSINESS MEDIA
(MPA/ANM/ABM-1)
(October 6, 2006)

Pursuant to sections 25, 26 and 27 of the rules of practice, Magazine Publishers of America, Inc., and Alliance of Nonprofit Mailers direct the attached follow-up interrogatory to American Business Media. MPA and ANM ask that, in responding to these requests, ABP follow the guidelines set forth below.

If any request is deemed burdensome or seeks information that the respondent reasonably believes is confidential, please contact the undersigned counsel to discuss possible limitations or alternative requests.

Please provide the name or names of the persons responsible for the response.

If information requested is not available in the exact format or level of detail requested, please provide responsive material in such different format or level of detail as is available.

If a privilege or confidentiality is claimed with respect to any information that is responsive to these requests, please describe the precise nature of any privilege claimed and describe information being withheld, including sufficient detail to enable a reasonable assessment of the claim of privilege or confidentiality.

If any information that would have been provided in response to these requests has been destroyed, please describe such data or documents and explain the circumstances under which they were destroyed.

Respectfully submitted,

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QUESTIONS

MPA/ANM/ABM-1. Please refer to the table attached to the answer filed by ABM on October 4, 2006, to TW/ABM-5.

(a) For each co-palletized publication in the table, please provide your best estimate of the total number of pieces in the entire co-palletization pool.

(b) For each co-palletized publication in the table, please provide your best estimate of the percentage of pieces that were entered at either the DADC, the DSCF, or the DDU.

(c) For each co-palletized publication in the table, please provide your best estimate of the percentage of pieces that were palletized.

(d) For each co-palletized publication in the table, please indicate whether any of the pieces were sacked to allow their transportation by air to their destination (as opposed to being sacked because there was insufficient volume in the pool to palletize).

(e) For each co-palletized publication in the table, please provide the percentage of sacked pieces that were sacked to allow their transportation by air to their destination (as opposed to being sacked because there was insufficient volume in the pool to palletize).

(f) Please provide your best estimate of the number of postal entry points for each co-palletized publication in the table. Please also explain fully whether it would be cost effective under current rates to enter the publication at additional entry points if it were transported entirely using surface transportation.

(g) Please provide your best estimate of the rate increase under the Postal Service and the MPA/ANM proposal for each co-palletized publication or each co-palletization pool in the table, assuming that all pieces in the pool are palletized and entered at the DADC.

(h) Does ABM believe that the percentage of pieces that are palletized and the percentage of pieces that are entered at the DADC, DSCF, or DDU for the co-palletized publications in the table are typical for co-palletized publications? Please explain your answer fully.