

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

Postal Rate and Fee Changes, 2006) Docket No. R2006-1

**OBJECTION AND RESPONSE
OF AMERICAN BUSINESS MEDIA
TO “FOLLOW-UP” INTERROGATORY SUBMITTED BY MAGAZINE
PUBLISHERS OF AMERICA/ASSOCIATION OF NONPROFIT MAILERS**

MPA/ANM/ABM – 1
(October 11, 2006)

Attached please find American Business Media's objection and response
to the interrogatory identified above.

Respectfully submitted,

/s/ David R. Straus
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RESPONSE OF AMERICAN BUSINESS MEDIA
TO MPA/ANM/ABM - 1

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.

OBJECTION

American Business Media objects to this interrogatory on the ground that it is not an appropriate follow-up interrogatory. MPA/ANM did not submit any timely interrogatories or other discovery requests to American Business Media, so that MPA/ANM cannot be said to be following up on any information that they sought individually or collectively. In addition, the table provided by ABM in response to TW/ABM – 5 was generated and provided to Time Warner for the purpose of determining the extent of co-mailing and co-palletizing being accomplished today by American Business Media members. The mere identification (without names) of such publications in response to an interrogatory does not serve to open up American Business Media to other parties seeking additional information with respect to those publications after the close of discovery. Finally, if MPA and/or MPA wish to accumulate information concerning each of the characteristics outlined in parts (a) through (h) of this request for a wide range of co-palletized publications, they can obtain that information from their own members.

RESPONSE

Notwithstanding and without waiving the objection set forth above, American Business Media provides the following response:

(a) through (h). American Business Media neither solicited nor obtained the information that would be necessary to provide any estimate, much less a “best estimate,” responsive to these requests. The sole purpose of the data collection effort was to determine the extent of co-palletizing and co-mailing being undertaken by American Business Media members so that American Business Media could exercise informed judgment on the various proposals made or to be made in this proceeding for redesigning Periodicals rates should it be determined that, for example, a particular proposal would prove more beneficial than another for co-mailed pieces but less beneficial than another for co-palletized pieces.

Person responsible for response: David R. Straus, counsel