

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

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

**SUPPLEMENTAL RESPONSE  
OF AMERICAN BUSINESS MEDIA  
TO "FOLLOW-UP" INTERROGATORY SUBMITTED BY MAGAZINE  
PUBLISHERS OF AMERICA/ASSOCIATION OF NONPROFIT MAILERS**

MPA/ANM/ABM – 1  
(October 19, 2006)

Attached please find American Business Media's supplemental response  
to the above-identified interrogatory.

Respectfully submitted,

/s/ David R. Straus  
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SUPPLEMENTAL 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.

## **SUPPLMENTAL RESPONSE**

Notwithstanding and without waiving the objection submitted previously, and based upon conversations between counsel for American Business Media and counsel for MPA/ANM concerning the information requested in the interrogatory, American Business Media hereby states that it sought additional information concerning the co-palletized publications included in the table provided as part of ABM's response to TW/ABM-5. The newly-obtained data are attached.

**Person responsible for response:** David R. Straus, counsel

**GROUP #1****Publications (A,B,C,D,E)****Copalletized**

	<u>Pieces</u>	<u>Sacks</u>	Average Pieces per sack	<u>Pallets</u>	Average Pieces per pallet
48 Total Entry Points					
17 Air Freight	51,211	741	56	0	0
31 Truck	147,053	159	26	116	1213

	<u>PALLETS</u>	<u>SACKS</u>
Orgin	76	517
DADC	13	38
DSCF	27	344
DDU	0	1
<b>TOTAL:</b>	<b>116</b>	<b>900</b>

**GROUP #2****Publications (F,G,H,I,J,K,L)****Copalletized**

	<u>Pieces</u>	<u>Sacks</u>	Average Pieces per sack	<u>Pallets</u>	Average Pieces per pallet
47 Total Entry Points					
16 Air Freight	88,064	1,083	54	0	0
31 Truck	256,335	257	24	137	1657

	<u>PALLETS</u>	<u>SACKS</u>
Orgin	101	881
DADC	8	39
DSCF	28	420
DDU	0	0
<b>TOTAL:</b>	<b>137</b>	<b>1340</b>