

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

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**POSTAL RATE AND FEE CHANGES 2006**

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**Docket No. R2006-1**

**REPLY BRIEF OF THE  
ASSOCIATION OF AMERICAN PUBLISHERS**

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The Association of American Publishers (“AAP”) hereby submits its Reply Brief in the above-captioned proceeding.

**I. BOUND PRINTED MATTER**

AAP supports the position taken by the Association of Postal Commerce and the Mailing and Fulfillment Service Association (“Postcom”) concerning the cost coverage for Bound Printed Matter. As Postcom’s Initial Brief points out, there has been considerable year-to-year fluctuation in the cost data for Bound Printed Matter. Postcom Initial Brief, p. 39. In addition, Bound Printed Matter is entitled to consideration under Criterion 8 in §3622(b) (materials with “educational, cultural, scientific and informational” value – or “ECSI”). The Postal Service does not really address these concerns in its Initial Brief. The Initial Brief of the Postal Service does not describe how ECSI considerations affected its proposed cost coverage level for Bound Printed Matter; nor does it address Postcom’s concern about the substantial year-to-year fluctuations in Bound Printed Matter cost data. The Postal Service’s Initial Brief merely provides a conclusory statement that the Bound Printed Matter rates proposed by Witness Yeh “are in accordance with the policies of the Act.” Postal Service Initial Brief, p. 340. The Postal Rate Commission should determine that the Postal Service has not demonstrated why any rates higher than the rates proposed by Postcom with a cost coverage level of 114 percent should be allowed to go into effect.

## **II. MEDIA MAIL AND LIBRARY MAIL**

### **A. Cost Coverage**

AAP supports the position taken by Postcom with respect to the cost coverage level for Media Mail. As with respect to Bound Printed Matter, the Postal Service has failed to justify the cost coverage level it proposes and has failed to describe how (or if) it has taken ECSI considerations into account in its rate proposal. The Postal Rate Commission should determine that the Postal Service has failed to demonstrate that rates for Media Mail and Library Mail any higher than the rates proposed by Postcom with a cost coverage level of 100.2 percent should be adopted.

### **B. Rate Design**

AAP also supports Postcom's proposed rate design for Media Mail and Library Mail which includes the use of one-half pound increments for presorted parcels that weigh over 1.0 pounds and less than 5.0 pounds. See Postcom Initial Brief, pp. 40-41.

Postcom's proposal produces rates that more accurately reflect differences in packages of different weights. The Postal Service has provided no convincing argument supporting its opposition to this proposal.

## **III. CONCLUSION**

For the above stated reasons, AAP respectfully submits that the Postal Rate Commission should:

1. adopt rates for Bound Printed Matter at the levels advocated by Postcom;
2. adopt rates for Media Mail and Library Mail at the levels proposed by Postcom; and

3. adopt Postcom's rate design for Media Mail and Library Mail which includes the use of one-half pound price increments for presorted parcels that weigh over 1.0 pounds and less than 5.0 pounds.

Respectfully submitted,

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/s/

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