

DOCKET SECTION

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Docket No. R97-1

POSTAL RATE AND FEE CHANGES, 1997

UNITED STATES POSTAL SERVICE
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO
THE MCGRAW HILL COMPANIES, INC. WITNESS HEHIR
(USPS/MH-T1-4-5)

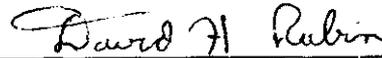
Pursuant to rules 25 and 26 of the Rules of Practice and Procedure and rule 2 of the Special Rules of Practice, the United States Postal Service directs the following interrogatories and requests for production of documents to The McGraw Hill Companies, Inc. witness Hehir: USPS/MH-T1-4-5.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



David H. Rubin

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January 23, 1998

USPS/MH-T1-4. Please refer to your testimony at page 3, lines 25 to 28, and at page 13, lines 7 to 9.

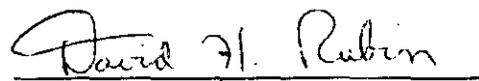
- (a) Please provide any quantitative support for your claim that "most" publications experienced significant rate increases as a result of "the MC95-1 reclassification case".
- (b) Please confirm that the 1995 increase you mention was the first increase in Postal Service rates for Second-Class/Periodicals Regular Rate for nearly 4 years. If you do not confirm, please explain why not.

USPS/MH-T1-5. Please refer to your testimony at page 13, lines 18 to 20.

- (a) Please confirm that, according to Postal Service witness Taufique, the 8 percent increase in the editorial pound rate is set at 90 percent of costs in order to mitigate the impact of the rate change on high editorial content mail. See USPS-T-34 at 14. If you do not confirm, please explain why not.
- (b) Do you believe that the editorial pound rate should eventually cover 100 percent of editorial pound costs? If not, please explain why not.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.



David H. Rubin

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