

DOCKET SECTION

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

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

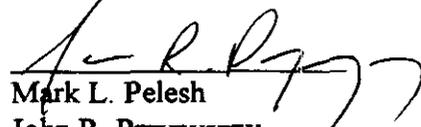
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POSTAL RATE AND FEE CHANGES, 1997 )  
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Docket No. R97-1

INTERROGATORIES OF THE ASSOCIATION  
OF AMERICAN PUBLISHERS TO  
UPS WITNESS HENDERSON  
(AAP/UPS-T-3-1)

Pursuant to Sections 25 and 26 of the Commission's Rules of Practice, the Association of American Publishers hereby submits the attached interrogatories to UPS witness Henderson (AAP/UPS-T-3-1). If the designated witnesses is unable to respond, we request a referral to another witness in possession of the requested information.

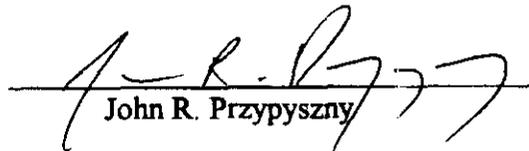
Respectfully submitted,

  
Mark L. Pelesh  
John R. Przypyszny  
Drinker Biddle & Reath  
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Suite 900  
Washington, D.C. 20005

Counsel for Association of  
American Publishers

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document, by First-Class Mail, upon the participants in this proceeding.

  
John R. Przypyszny

DATE: January 28, 1998

**INTERROGATORIES OF THE ASSOCIATION  
OF AMERICAN PUBLISHERS TO  
UPS WITNESS HENDERSON  
(AAP/UPS-T-3-1)**

1. Exhibit UPS-T-3C to your testimony identifies the Postal Service's proposed volume variable cost for Standard B Mail, Bound Printed Matter, to be 346,000,000 with a markup of 51%. Exhibit UPS-T-3B to your testimony identifies the volume variable cost for Standard B Mail, Bound Printed Matter, to be \$388,000,000 with a markup of 35.1%.
  - a. Please explain and justify, in detail, the differences between the volume variable costs for Standard B Mail Bound Printed Matter as set forth in each exhibit.
  - b. Please explain and justify, in detail, the differences between the markup for Standard B Mail Bound Printed Matter as set forth in each exhibit.