

DOCKET SECTION

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

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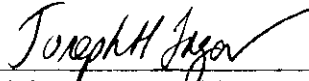
) Docket No. R97-1

**OBJECTIONS AND RESPONSES OF
DOW JONES & COMPANY, INC. TO
INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS OF
UNITED STATES POSTAL SERVICE
(USPS/DJ-1-34)
(February 2, 1998)**

Pursuant to Rules 25 and 26 of the Commission's Rules of Practice, Dow Jones & Company, Inc. ("Dow Jones") hereby replies to the interrogatories and requests for production of documents posed by the United States Postal Service (USPS/DJ-1-34) on January 22, 1998.

Each interrogatory is stated verbatim and is followed by the objection and the response.

Respectfully submitted,



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February 2, 1998

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**OBJECTIONS AND RESPONSES OF
DOW JONES & COMPANY, INC. TO INTERROGATORIES AND
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USPS/DJ-1. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide a list of publications published by your company and mailed at second-class regular or periodical regular rates.

RESPONSE:

Objection: In light of the fact that Dow Jones's Witness William B. Shew's (DJ-T1) testimony was concerned solely with assessing the strengths and weaknesses of the USPS' new methodology for estimating mail processing costs, Dow Jones objects to this question as being beyond the scope of, and not relevant to, Witness Shew's testimony. Witness Shew did not discuss the impact of the USPS proposal on the mail characteristics of Dow Jones's publications. The only reference to Dow Jones was, in fact, on the cover page of his direct testimony. Providing this information for the past twelve years will not aid the Postal Rate Commission in evaluating either Witness Shew's testimony or the USPS' mail processing cost methodology.

Nevertheless, Dow Jones is providing the requested information to the extent that it is available, while preserving its objection that the information is irrelevant to Witness Shew's testimony.

Response:

<u>Calendar Year</u>	<u>Publications</u>
1986	The Wall Street Journal Barron's The Asian Wall Street Journal Weekly
1987	The Wall Street Journal Barron's The Asian Wall Street Journal Weekly

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1988	The Wall Street Journal Barron's The Asian Wall Street Journal Weekly
1989	The Wall Street Journal Barron's The Asian Wall Street Journal Weekly
1990	The Wall Street Journal Barron's The Asian Wall Street Journal Weekly
1991	The Wall Street Journal Barron's The Asian Wall Street Journal Weekly
1992	The Wall Street Journal Barron's The Asian Wall Street Journal Weekly
1993	The Wall Street Journal Barron's The Asian Wall Street Journal Weekly
1994	The Wall Street Journal Barron's The Asian Wall Street Journal Weekly National Business Employment Weekly
1995	The Wall Street Journal Barron's The Asian Wall Street Journal Weekly National Business Employment Weekly
1996	The Wall Street Journal

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Barron's
The Asian Wall Street Journal Weekly
National Business Employment Weekly

1997 The Wall Street Journal
 Barron's
 The Asian Wall Street Journal Weekly
 National Business Employment Weekly

1998 The Wall Street Journal
 Barron's
 The Asian Wall Street Journal Weekly
 National Business Employment Weekly

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USPS/DJ-2. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please for each publication listed in response to interrogatory number 1 the following information:

- (a) The number of issues mailed.
- (b) The average number of editions (versions) per issue.
- (c) An indication of the kind or type of each version.

RESPONSE:

Objection: See objection to USPS/DJ-1.

Response:

- (a)

Calendar Year	<u>WSJ</u>	<u>Barron's</u>	<u>Asian Weekly</u>	<u>NBEW</u>
1986	254	52	52	Not Available
1987	255	52	52	Not Available
1988	254	52	52	Not Available
1989	253	52	52	Not Available
1990	254	53	53	Not Available
1991	254	52	52	Not Available
1992	256	52	52	Not Available
1993	255	52	52	Not Available
1994	254	52	52	49
1995	253	52	52	52
1996	255	53	52	52
1997	254	52	51	52

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(b)

Calendar Year	<u>WSJ</u>	<u>Barron's</u>	<u>Asian Weekly</u>	<u>NBEW</u>
1986	4.31	1.85	1	Not Available
1987	4.93	1.92	1	Not Available
1988	6.59	1.90	1	Not Available
1989	8.43	1.92	1	Not Available
1990	10.54	2.15	1	Not Available
1991	10.95	2.31	1	Not Available
1992	10.50	3.31	1	Not Available
1993	11.12	3.35	1	Not Available
1994	11.67	3.52	1	1
1995	12.02	2.52	1	1
1996	12.00	2.08	1	1
1997	11.24	1.52	1	1

(c) Dow Jones only maintains this information for The Wall Street Journal and Barron's.

From 1986 until December 1996, The Wall Street Journal published four (4) major daily editions, the Eastern, Midwest, Southwest, and Western Editions. Starting in January 1997, the Southwest and Midwest Editions were combined to form the Central Edition, making three (3) major editions daily. In addition to the major editions, The Wall Street Journal currently publishes 18 regional advertising editions on Mondays and Fridays and four (4) special editorial and advertising editions available on Wednesdays in selected markets. The first regional edition started in 1986 and the others were added over the past 10 years.

Barron's publishes one national edition and periodically prints regional advertising editions in the East, Midwest, Southwest and West.

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USPS/DJ-3. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the total volumes mailed at second-class regular or periodical regular rates for each publication listed in response to interrogatory number 1.

RESPONSE:

Objection: See objection to USPS/DJ-1.

Response:

<u>Calendar Year</u>	<u>WSJ</u>	<u>Barron's</u>	<u>Asian Weekly</u>	<u>NBEW</u>
1986	257549810	7803325	Not Available	Not 2 nd Class
1987	245163165	7827633	Not Available	Not 2 nd Class
1988	220776119	6987724	Not Available	Not 2 nd Class
1989	211573517	6742711	Not Available	Not 2 nd Class
1990	208888846	7033439	Not Available	Not 2 nd Class
1991	199164158	6951063	Not Available	Not 2 nd Class
1992	188784198	7476119	Not Available	Not 2 nd Class
1993	182428662	7996002	286936	Not 2 nd Class
1994	164495525	8321628	301852	395300
1995	155097856	8286115	292848	584475
1996	151019172	8829392	292370	528264
1997	135768364	8269815	257604	460463

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USPS/DJ-4. For each fiscal year (or calendar year if year is unavailable) from 1986 to present, please provide the volumes mailed at second-class regular or periodical regular required presort rates for each publication listed in response to interrogatory number 1.

RESPONSE:

Objection: See objection to USPS/DJ-1.

Response:

<u>Calendar Year</u>	<u>WSJ</u>	<u>Barron's</u>	<u>Asian Weekly</u>	<u>NBEW</u>
1986	Not Available	Not Available	Not Available	Not 2 nd Class
1987	8170313	1067874	Not Available	Not 2 nd Class
1988	8132322	1038961	Not Available	Not 2 nd Class
1989	8227425	1044062	Not Available	Not 2 nd Class
1990	8283011	1086695	Not Available	Not 2 nd Class
1991	8357373	1080288	Not Available	Not 2 nd Class
1992	8615909	1109705	Not Available	Not 2 nd Class
1993	8855461	1136890	Not Available	Not 2 nd Class
1994	8423137	1159991	Not Available	Not Available
1995	8312491	1141464	Not Available	Not Available
1996	8416402	1178568	Not Available	Not Available
1997	8215313	1153891	Not Available	Not Available

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USPS/DJ-5. For each fiscal year (or calendar year if year is unavailable) from 1986 to present, please provide the volumes mailed at second-class regular or periodical regular 3-digit city/5 digit presort rates for each publication listed in response to interrogatory number 1.

RESPONSE:

Objection: See objection to USPS/DJ-1.

Response:

Calendar Year	<u>WSJ</u>	<u>Barron's</u>	<u>Asian Weekly</u>	<u>NBEW</u>
1986	Not Available	Not Available	Not Available	Not 2 nd Class
1987	231063025	6655540	Not Available	Not 2 nd Class
1988	207385478	5863868	Not Available	Not 2 nd Class
1989	198207154	5627586	Not Available	Not 2 nd Class
1990	195890416	5894774	Not Available	Not 2 nd Class
1991	186665278	5821698	Not Available	Not 2 nd Class
1992	176332214	6330560	Not Available	Not 2 nd Class
1993	170053189	6821388	Not Available	Not 2 nd Class
1994	149732509	7088629	Not Available	Not Available
1995	134804242	7082311	Not Available	Not Available
1996	123574494	7595920	Not Available	Not Available
1997	105551709	7063324	Not Available	Not Available

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USPS/DJ-6. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volumes mailed at second-class regular or periodical regular carrier route presort rates for each publication listed in response to interrogatory number 1.

RESPONSE:

Objection: See objection to USPS/DJ-1.

Response:

<u>Calendar Year</u>	<u>WSJ</u>	<u>Barron's</u>	<u>Asian Weekly</u>	<u>NBEW</u>
1986	Not Available	Not Available	Not Available	Not 2 nd Class
1987	5494921	74002	Not Available	Not 2 nd Class
1988	4811208	57069	Not Available	Not 2 nd Class
1989	4776539	47123	Not Available	Not 2 nd Class
1990	4352288	27730	Not Available	Not 2 nd Class
1991	3795276	25776	Not Available	Not 2 nd Class
1992	3501002	13214	Not Available	Not 2 nd Class
1993	3146737	12692	Not Available	Not 2 nd Class
1994	5998846	56261	Not Available	Not Available
1995	11707548	52527	Not Available	Not Available
1996	18948758	46437	Not Available	Not Available
1997	21940274	45089	Not Available	Not Available

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USPS/DJ-7. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volumes mailed at second-class regular or periodical regular destination delivery office discount rates for each publication listed in response to interrogatory number 1.

RESPONSE:

Objection: See objection to USPS/DJ-1.

Response: None of the publications listed in response to USPS/DJ-1 are sorted at the level necessary to qualify for the destination delivery office discount rates.

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USPS/DJ-8. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volumes mailed at second class regular or periodical regular destination SCF discount rates for each publication listed in response to interrogatory number 1.

RESPONSE:

Objection: See objection to USPS/DJ-1.

Response:

<u>Calendar Year</u>	<u>WSJ</u>	<u>Barron's</u>	<u>Asian Weekly</u>	<u>NBEW</u>
1986	105440265	1157247	Not Available	Not 2 nd Class
1987	100564568	1601969	Not Available	Not 2 nd Class
1988	96793179	1538844	Not Available	Not 2 nd Class
1989	104728584	1485367	Not Available	Not 2 nd Class
1990	108314419	1750679	Not Available	Not 2 nd Class
1991	108054224	1829832	Not Available	Not 2 nd Class
1992	108934678	2084036	Not Available	Not 2 nd Class
1993	111004635	2631602	Not Available	Not 2 nd Class
1994	101869516	3052943	Not Available	Not Available
1995	98145532	3128530	Not Available	Not Available
1996	97134430	3403702	Not Available	Not Available
1997	86406417	3313447	Not Available	Not Available

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USPS/DJ-9. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volumes mailed at second-class regular or periodical regular high density discount rates for each publication listed in response to interrogatory number 1.

RESPONSE:

Objection: See objection to USPS/DJ-1.

Response: None of the publications listed in response to UPS/DJ-1 qualify for high density discount rates.

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USPS/DJ-10. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volumes mailed at second-class regular or periodical regular saturation discount rates for each publication listed in response to interrogatory number 1.

RESPONSE:

Objection: See objection to USPS/DJ-1.

Response: None of the publications listed in response to UPS/DJ-1 qualify for saturation discount rates.

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USPS/DJ-11. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the required presort volumes mailed at second-class regular or periodical regular prebarcoded letter size discount rates for each publication listed in response to interrogatory number 1.

RESPONSE:

Objection: See objection to USPS/DJ-1.

Response: None of the publications listed in response to UPS/DJ-1 qualify for prebarcoded discount rates.

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USPS/DJ-12. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volumes mailed at second-class regular or periodical regular prebarcoded flat size discount rates for each publication listed in response to interrogatory number 1.

RESPONSE:

Objection: See objection to USPS/DJ-1.

Response: See response to USPS/DJ-11.

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USPS/DJ-13. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the 3-digit/5-digit volumes mailed at second class regular or periodical prebarcoded 3-digit letter size discount rates for each publication listed in response to interrogatory number 1.

RESPONSE:

Objection: See objection to USPS/DJ-1.

Response: See response to USPS/DJ-11.

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USPS/DJ-14. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the 3-digit city/5-digit volumes mailed at second-class regular or periodical regular prebarcoded 5-digit letter size discount rates for each publication listed in response to interrogatory number 1.

RESPONSE:

Objection: See objection to USPS/DJ-1.

Response: See response to USPS/DJ-11.

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USPS/DJ-15. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the 3-digit city/5-digit volumes mailed at second-class regular or periodical regular prebarcoded flat size discount rates for each publication listed in response to interrogatory number 1.

RESPONSE:

Objection: See objection to USPS/DJ-1.

Response: See response to USPS/DJ-11.

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USPS/DJ-16. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volume, total weight and advertising weight mailed at second-class regular or periodical regular rates for zones 1&2 for each publication listed in response of interrogatory number 1.

RESPONSE:

Objection: In light of the fact that Dow Jones's Witness William B. Shew's (DJ-T1) testimony was concerned solely with assessing the strengths and weaknesses of the USPS' new methodology for estimating mail processing costs, Dow Jones objects to this question as being beyond the scope of Witness Shew's testimony. Witness Shew did not discuss the impact of the USPS' proposal on Dow Jones's business operations. The only reference to Dow Jones was, in fact, on the cover page of his direct testimony. Providing this information for the past twelve years will not aid the Postal Rate Commission in evaluating either Witness Shew's testimony or the USPS' mail processing cost methodology.

Dow Jones also objects to this question as it seeks information which is readily obtainable by the USPS from its own files, as this information is submitted weekly to the USPS on form 3541. Any information which Dow Jones could provide in response to this interrogatory would be of no more probative value than the same information which is already in the possession of the USPS.

Nevertheless, Dow Jones is providing the requested information to the extent that it is available, while preserving its objection that the information is irrelevant to Witness Shew's testimony.

Response: Dow Jones does not maintain volume, total weight and advertising weight information for any of its publications for deliveries by zone.

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USPS/DJ-17. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volume, total weight and advertising weight mailed at second-class regular or periodical regular rates for zone 3 for each publication listed in response to interrogatory number 1.

RESPONSE:

Objection: See objections to USPS/DJ-16.

Response: See response to USPS/DJ-16.

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USPS/DJ-18. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volume, total weight and advertising weight mailed at second-class regular or periodical regular rates for zone 4 for each publication listed in response to interrogatory number 1.

RESPONSE:

Objection: See objections to USPS/DJ-16.

Response: See response to USPS/DJ-16.

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USPS/DJ-19. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volume, total weight and advertising weight mailed at second-class regular or periodical regular rates for zone 5 for each publication listed in response to interrogatory number 1.

RESPONSE:

Objection: See objections to USPS/DJ-16.

Response: See response to USPS/DJ-16.

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USPS/DJ-20. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volume, total weight and advertising weight mailed at second-class regular or periodical regular rates for zone 6 for each publication listed in response to interrogatory number 1.

RESPONSE:

Objection: See objections to USPS/DJ-16.

Response: See response to USPS/DJ-16.

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USPS/DJ-21. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volume, total weight and advertising weight mailed at second-class regular or periodical regular rates for zone 7 for each publication listed in response to interrogatory number 1.

RESPONSE:

Objection: See objections to USPS/DJ-16.

Response: See response to USPS/DJ-16.

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USPS/DJ-22. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volume, total weight and advertising weight mailed at second-class regular or periodical regular rates for zone 8 for each publication listed in response to interrogatory number 1.

RESPONSE:

Objection: See objections to USPS/DJ-16.

Response: See response to USPS/DJ-16.

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USPS/DJ-23. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the average percentage of nonadvertising content mailed at second-class regular rates for each publication listed in response to interrogatory number 1.

RESPONSE:

Objection: See objections to USPS/DJ-16.

Response: See response to USPS/DJ-16.

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USPS/DJ-24. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volumes mailed on pallets at second-class regular or periodical regular rates for each publication listed in response to interrogatory number 1 by the following pallet presort levels:

- (a) 5-digit pallets
- (b) 3-digit pallets
- (c) SCF pallets
- (d) ADC/SDC pallets
- (e) BMC pallets
- (f) Mixed-BMC pallets

RESPONSE:

Objection: See objection to USPS/DJ-1.

Response:

- (a) None of the publications listed in response to USPS/DJ-1 are palletized.
- (b) None of the publications listed in response to USPS/DJ-1 are palletized.
- (c) None of the publications listed in response to USPS/DJ-1 are palletized.
- (d) None of the publications listed in response to USPS/DJ-1 are palletized.
- (e) None of the publications listed in response to USPS/DJ-1 are palletized.
- (f) None of the publications listed in response to USPS/DJ-1 are palletized.

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USPS/DJ-25. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, for those volumes mailed on pallets at second-class regular or periodical regular rates for each publication listed in response to interrogatory number 1, please provide the average number of pieces per pallet by the following pallet presort levels:

- (a) 5-digit pallets
- (b) 3-digit pallets
- (c) SCF pallets
- (d) ADC/SDC pallets
- (e) BMC pallets
- (f) Mixed-BMC pallets.

RESPONSE:

Objection: See objection to USPS/DJ-1.

Response: (a) - (f) See response to USPS/DJ-24.

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USPS/DJ-26. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, for those volumes mailed on pallets at second-class regular or periodical regular rates for each publication listed in response to interrogatory number 1, please provide the average pallet weight by the following pallet presort levels:

- (a) 5-digit pallets
- (b) 3-digit pallets
- (c) SCF pallets
- (d) ADC/SDC pallets
- (e) BMC pallets
- (f) Mixed-BMC pallets

RESPONSE:

Objection: See objection to USPS/DJ-1.

Response: (a) - (f) See response to USPS/DJ-24.

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USPS/DJ-27. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volumes mailed in sacks at second-class regular or periodical regular rates for each publication listed in response to interrogatory number 1 by the following sack presort levels:

- (a) Carrier route(s) sacks
- (b) Firm sacks
- (c) 5-digit sacks
- (d) 3-digit unique city sacks
- (e) 3-digit sacks
- (f) SCF sacks
- (g) ADC/SDC sacks
- (h) Mixed sacks.

RESPONSE:

Objection: See objection to USPS/DJ-1.

Response: (a) - (h) Dow Jones does not use sacks in distributing The Wall Street Journal, Barron's or National Business Employment Weekly. Some local mail distribution for The Asian Wall Street Journal Weekly is placed in sacks, but Dow Jones does not maintain volume information for this publication as it relates to sacks.

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USPS/DJ-28. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, for those volumes mailed in sacks at second-class regular or periodical regular rates for each publication listed in response to interrogatory number 1, please provide the average number of pieces per sack by the following sack presort levels:

- (a) Carrier route(s) sacks
- (b) Firm sacks
- (c) 5-digit sacks
- (d) 3-digit unique city sacks
- (e) 3-digit sacks
- (f) SCF sacks
- (g) ADC/SDC sacks
- (h) Mixed sacks.

RESPONSE:

Objection: See objection to USPS/DJ-1.

Response: (a) - (h) See response to USPS/DJ-27.

**OBJECTIONS AND RESPONSES OF
DOW JONES & COMPANY, INC. TO INTERROGATORIES AND
REQUESTS FOR PRODUCTION OF DOCUMENTS
OF UNITED STATES POSTAL SERVICE**

USPS/DJ-29. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volumes mailed in trays at second-class regular or periodical regular rates for each publication listed in response to interrogatory number 1 by the following tray presort levels:

- (a) Carrier route(s) trays
- (b) Firm trays
- (c) 5-digit trays
- (d) 3-digit unique city trays
- (e) 3-digit trays
- (f) SCF trays
- (g) ADC/SDC trays
- (h) Mixed trays.

RESPONSE:

Objection: See objection to USPS/DJ-1.

Response: (a) - (h) None of the publications listed in response to USPS/DJ-1 are mailed in trays.

**OBJECTIONS AND RESPONSES OF
DOW JONES & COMPANY, INC. TO INTERROGATORIES AND
REQUESTS FOR PRODUCTION OF DOCUMENTS
OF UNITED STATES POSTAL SERVICE**

USPS/DJ-30. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, for those volumes mailed in trays at second-class regular or periodical regular rates for each publication listed in response to interrogatory number 1, please provide the average number of pieces per tray by the following tray presort levels:

- (a) Carrier route(s) trays
- (b) Firm trays
- (c) 5-digit trays
- (d) 3-digit unique city trays
- (e) 3-digit trays
- (f) SCF trays
- (g) ADC/SDC trays
- (h) Mixed trays.

RESPONSE:

Objection: See objection to USPS/DJ-1.

Response: (a)-(h) See response to USPS/DJ-29.

**OBJECTIONS AND RESPONSES OF
DOW JONES & COMPANY, INC. TO INTERROGATORIES AND
REQUESTS FOR PRODUCTION OF DOCUMENTS
OF UNITED STATES POSTAL SERVICE**

USPS/DJ-31. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volumes mailed in bundles at second-class regular or periodical regular rates for each publication listed in response to interrogatory number 1.

RESPONSE:

Objection: See objection to USPS/DJ-1.

Response: Dow Jones does not maintain volume information as it relates to bundles.

**OBJECTIONS AND RESPONSES OF
DOW JONES & COMPANY, INC. TO INTERROGATORIES AND
REQUESTS FOR PRODUCTION OF DOCUMENTS
OF UNITED STATES POSTAL SERVICE**

USPS/DJ-32. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, for those volumes mailed in bundles at second-class regular or periodical regular rates for each publication listed in response to interrogatory number 1, please provide the average number of pieces per bundle.

RESPONSE:

Objection: See objection to USPS/DJ-1.

Response: See response to USPS/DJ-31.

**OBJECTIONS AND RESPONSES OF
DOW JONES & COMPANY, INC. TO INTERROGATORIES AND
REQUESTS FOR PRODUCTION OF DOCUMENTS
OF UNITED STATES POSTAL SERVICE**

USPS/DJ-33. For each fiscal year (or calendar year if fiscal year is unavailable) from 1986 to present, please provide the volumes mailed at second-class regular or periodical regular rates that were plant loaded in USPS provided transportation for each publication listed in response to interrogatory number 1.

RESPONSE:

Objection: See objection to USPS/DJ-1.

Response: Dow Jones does not maintain information relating to volumes plant loaded in USPS provided transportation.

**OBJECTIONS AND RESPONSES OF
DOW JONES & COMPANY, INC. TO INTERROGATORIES AND
REQUESTS FOR PRODUCTION OF DOCUMENTS
OF UNITED STATES POSTAL SERVICE**

USPS/DJ-34. Please also provide all data furnished in response to interrogatories 1 through 33 above in electronic format.

RESPONSE:

Objection: See objection to USPS/DJ-1.

Response: Because Dow Jones has provided little data in response to USPS/DJ-1-33, it is not currently responding to this question upon advice of counsel for the USPS. However, if upon review of these responses, the USPS still wishes to receive this data in electronic format, Dow Jones will respond accordingly.

DECLARATION

I, Richard L. GRAFF, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information and belief.

Richard L. Graff

Dated: FEBRUARY 2, 1998

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.

A handwritten signature in cursive script, reading "Joseph H. Fagan", is written over a horizontal line.

Joseph H. Fagan

Dated: February 2, 1998