

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

\_\_\_\_\_  
POSTAL RATE AND FEE CHANGES, 1997 )  
\_\_\_\_\_ )

Docket No. R97-11

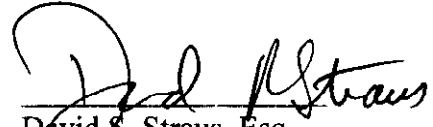
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OFFICE OF THE CLERK

ANSWER OF AMERICAN BUSINESS PRESS TO INTERROGATORY OF  
UNITED STATES POSTAL SERVICE (USPS/ABP-35)  
(February 17, 1998)

The American Business Press hereby submits its response to interrogatory  
USPS/ABP-35. It is submitted by ABP's President, Gordon T. Hughes, II.

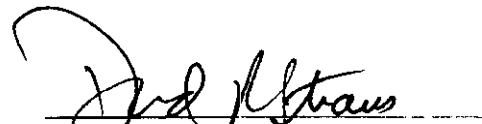
Respectfully submitted,



David S. Straus, Esq.  
THOMPSON COBURN  
700 14<sup>th</sup> Street, N.W., Suite 900  
Washington, D.C. 20005

**CERTIFICATE OF SERVICE**

I hereby certify that I have this date served the foregoing documents in accordance  
with Section 12 of the Commission's Rules of Practice.

  
David S. Straus, Esq.

Dated: February 17, 1998

## **ANSWER OF AMERICAN BUSINESS PRESS TO INTERROGATORY USPS/ABP-35**

**USPS/ABP-35.** In response to USPS/ABP-24-33, American Business Press indicates that the only specific data on members' mailing characteristics was provided in prior dockets by witness James B. Kobak.

- a. Does ABP know generally how its members' mailings are prepared and how that preparation has changed for each of the last ten years? If so, please explain fully.
- b. Does ABP have any general information about its members' mailings which would indicate, by year, the changes in make-up such as changes in average bundle size, changes in containerization, and the average number of bundles and pieces per container? If so, please explain fully.
- c. Does ABP have any general information about its members' mailings which would indicate in percentage terms, what savings, if any, its members have experienced in their mail preparation costs (excluding postage) due to changes in the make-up of their mailings. If so, please explain fully.
- d. Even if a percentage cannot be calculated for such savings, as requested in subpart (c) above, please indicate whether or not ABP knows or believes that its members have experienced savings.

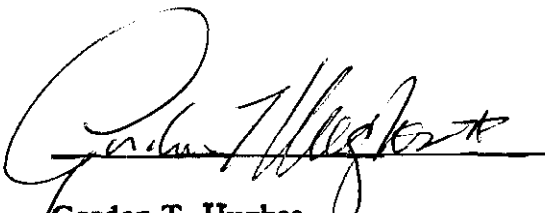
### **ANSWER**

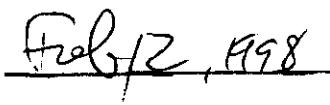
**USPS/ABP-35.**

- a-d. ABP does not itself employ postal experts, does not collect this type of data, and does not have the kind of detailed information about its members' mailing practices that would permit it to answer these questions.

DECLARATION

I, Gordon T. Hughes, declare under penalty of perjury that the foregoing answers are true and correct to the best of my knowledge, information and belief.

  
Gordon T. Hughes

  
Date