

UNITED STATES OF AMERICA
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Before Commissioners:

Robert G. Taub, Chairman;
Tony Hammond, Vice Chairman;
Mark Acton; and
Nanci E. Langley

Periodic Reporting
(Proposal Eight)

Docket No. RM2017-12

ORDER ON ANALYTICAL PRINCIPLES
USED IN PERIODIC REPORTING (PROPOSAL EIGHT)

(Issued February 7, 2018)

I. INTRODUCTION

On July 31, 2017, the Postal Service filed a petition pursuant to 39 C.F.R. § 3050.11 requesting that the Commission initiate a rulemaking proceeding to consider changes to analytical principles relating to periodic reports and compliance determinations.¹ The Petition identifies the proposed analytical method changes filed in this docket as Proposal Eight. Proposal Eight seeks to modify the analytical principle related to the application of the “60 percent rule” which governs the ratio of average revenue per piece of nonprofit USPS Marketing Mail to commercial USPS Marketing

¹ Petition of the United States Postal Service for the Initiation of a Proceeding to Consider Proposed Changes in Analytical Principles (Proposal Eight), July 31, 2017 (Petition).

Mail.² For the reasons outlined below, the Commission rejects the Postal Service's Proposal Eight.

II. PROCEDURAL HISTORY

On July 31, 2017, the Postal Service petitioned the Commission to initiate a rulemaking to consider Proposal Eight, which relates to the calculation of the preferred rates for USPS Marketing Mail nonprofit mailers. The Postal Service proposes to apply the 60 percent rule to subclasses rather than the entire USPS Marketing Mail class.

On August 25, 2017, the Alliance for Nonprofit Mailers (ANM) submitted a motion for issuance of information request.³ In its Motion, ANM referred to Table 1 on page 3 of the Petition filed by the Postal Service on July 31, 2017. It requested that the Postal Service "produce workpapers sufficient to replicate the values in the table from publically available sources." Motion at 1.

On August 31, 2017, the Postal Service responded to ANM's request by submitting Supplemental Material Supporting Proposal Eight, which included an updated Table 1, Standard Mail workpapers for Docket No. R2017-1, and Standard Mail Billing Determinants for all years 2000 through 2016.⁴ The Postal Service's updated version of Table 1 includes links to all source data.

On December 14, 2017, the Commission issued CIR No. 1 requesting the Postal Service to recalculate "the estimated price changes for Commercial Enhanced Carrier Route, Nonprofit Enhanced Carrier Route, Commercial Regular Mail, and Nonprofit Regular Mail necessary to implement Proposal Eight . . . using USPS Marketing Mail

² Petition, Proposal Eight at 1. Standard Mail was renamed USPS Marketing Mail as of January 22, 2017.

³ Motion of Alliance of Nonprofit Mailers for Issuance of Information Request to the United States Postal Service, August 25, 2017 (Motion).

⁴ See Notice of the United States Postal Service of Filing Supplemental Material Regarding Proposal Eight as USPS-RM2017-12/1, August 31, 2017; see *also* Library Reference USPS-RM2017-12/2, September 26, 2017.

workpapers from Docket No. R2018-1, Library Reference PRC-LR-R2018-1/2, November 9, 2017.”⁵

On December 21, 2017, the Postal Service responded to CIR No. 1, question 1.⁶ On January 3, 2018, it responded to CIR No. 1, question 2.⁷

III. BACKGROUND

Commonly referred to as the 60 percent rule, 39 U.S.C. § 3626(a)(6)(A) states that for USPS Marketing Mail “the estimated average revenue per piece . . . of subclass of [nonprofit] mail . . . shall be equal, as nearly as practicable, to 60 percent of the estimated average revenue per piece to be received from the most closely corresponding regular-rate subclass of mail.” Petition, Proposal Eight at 2 (emphasis omitted). Revenue per piece is calculated by dividing total revenue by the number of pieces.

After the passage of the Postal Accountability and Enhancement ACT (PAEA) in 2006, the term “subclass” *i.e.*, USPS Marketing Mail Regular and USPS Marketing Mail Enhanced Carrier Route (ECR) was no longer explicitly defined in the Mail Classification Schedule. In Docket No. R2008-1, the first notice of price adjustments after the PAEA, the Postal Service noted that although the ratio was previously calculated at the subclass level, “[s]ince subclasses no longer exist in the new pricing system, the Postal Service has now calculated this ratio at the class level.”⁸ The Commission accepted

⁵ Commission Information Request No. 1, December 14, 2017 (CIR No.1). The Postal Service issued a Motion of the United States Postal Service Requesting Extension of Time to Respond to Question 2 of CIR No.1, December 21, 2017 (Motion to Extend Time). The Commission granted the Motion to Extend Time. See Order Granting Motion for Extension of Time, December 26, 2017 (Order No. 4298).

⁶ Response of the United States Postal Service to Question 1 of Commission Information Request No.1, December 21, 2017 (December 21, 2017 Response to CIR No. 1).

⁷ Response of the United States Postal Service to Question 2 of Commission Information Request No. 1, January 3, 2018 (January 3, 2018 Response to CIR No. 1).

⁸ Docket No. R2008-1, United States Postal Service Notice of Market-Dominant Price Adjustment, February 11, 2008, at 24.

this rationale, and the Postal Service subsequently began to apply the 60 percent rule at the class level.⁹

In its Petition, the Postal Service states that, as a consequence of applying the 60 percent rule at the class level, rates for nonprofit have not increased as much as the rates for commercial mailers. See Petition, Proposal Eight at 3.

IV. PROPOSAL EIGHT

The Postal Service proposes to return to its pre-PAEA practice of applying the 60 percent rule separately to USPS Marketing Mail Regular and USPS Marketing Mail ECR. Proposal Eight would result in the calculation of two nonprofit-commercial ratios, one for the former Regular subclass and one for the former ECR subclass. Each would require that the average revenue per piece for nonprofit be 60 percent of its commercial counterpart. The Postal Service asserts that this method would be consistent with the language of the statute and would be done in accordance with the pre-PAEA subclass definitions. See *id.* at 5.

The Postal Service asserts that if the “60 percent rule” is applied at the subclass level, the result would be a reversal of “the downward shift in the two subclass-level Nonprofit-to-Commercial average revenue per piece ratios that occurred when the Postal Service switched to applying the rule at the class level.” *Id.* The Postal Service states “[t]he updated Docket No. R2018-1 revenue-neutral price changes that would be necessary to move the nonprofit-to-commercial average revenue per piece ratio to 60 percent at the subclass level are +0.74 percent for Nonprofit ECR, -0.03 percent for Commercial ECR, +4.20 percent for Nonprofit Regular, and -0.61 percent for

⁹ See Docket No. R2008-1, Review of Postal Service Notice of Market Dominant Price Adjustment, March 17, 2008, at 32 (Order No. 66).

Commercial Regular.”¹⁰ If adopted, the Postal Service would aim to phase in the price changes to avoid rate shock. Petition, Proposal Eight at 5.

V. COMMENTS

The Commission received over a hundred comments on Proposal Eight, with a majority supporting rejection of the proposal.¹¹ The full list of commenters appears in the Appendix.

A common theme among nonprofit mailers seeking rejection of the Petition is that application of the 60 percent rule at the subclass level would negatively impact the missions of nonprofit mailers dependent on the current system of calculation.¹² Alliance of Nonprofit Mailers (ANM) contends that the current methodology protects nonprofit mailers from unpredictable rate fluctuations and manipulations to rate design and mail preparation requirements.¹³ It claims that the relationships between nonprofit and commercial rates have remained stable since 2008 and the Postal Service has not articulated sufficient rationale to depart from the current methodology. ANM Comments at 10-13. The DMA Nonprofit Federation and the Data & Marketing Association (collectively, DMA) speculate that acceptance of this Petition “sets a dangerous

¹⁰ December 21, 2017 Response to CIR No. 1. The Postal Service had originally calculated a price change of +3.33 percent for Regular Nonprofit, -0.47 percent for Regular Commercial, +6.94 percent for ECR Nonprofit, and -0.27 percent for ECR Commercial. These price changes were based on Docket No. R2017-1 workpapers. Petition, Proposal Eight at 5.

¹¹ There were 99 initial comments timely filed by the comment deadline of September 18, 2017. Nineteen comments were filed after the comment deadline, none of which were accompanied by motions for late acceptance. Additionally, both the Postal Service and ANM filed leave to submit reply comments after the comment deadline had passed. See Motion of the United States Postal Service for Leave to File Reply Comments Regarding Proposal Eight, September 26, 2017; Response of Alliance of Nonprofit Mailers to Motion of the United States Postal Service for Leave to File Reply Comments, October 3, 2017. Both motions for leave to file reply comments are granted. Any other outstanding motions in this docket are denied.

¹² See e.g., Comments of The National Children’s Cancer Society, September 12, 2017 (NCCS Comments); Comments of The Nature Conservancy, September 18, 2017 (TNC Comments); Comments of Make-a-Wish Foundation of America, September 18, 2017 (Make-a-Wish Comments).

¹³ Comments of Alliance of Nonprofit Mailers, September 18, 2017, at 2-3 (ANM Comments).

precedent” to enable the Postal Service to make more drastic accounting changes for many other products.¹⁴

The American Catalog Mailer’s Association and the Public Representative both filed comments in support of the Petition.¹⁵ ACMA asserts that the fact that subclasses no longer exist under the PAEA does not mean that the Commission would be constrained from accepting subclass-based computation of the 60 percent rule because they remain “meaningful aggregations” to the Postal Service and such an application would balance the Postal Service’s pricing flexibility with the constraints of the statute. ACMA Comments at 6-7. The Public Representative agrees that the Petition is consistent with the PAEA and may even help the Postal Service “come closer to achieving the express goal of section 3626(a)(6)(A).” PR Comments at 4. He suggests that to mitigate the impact on nonprofit mailers, the Postal Service should stagger implementation of the proposed changes over more than the two price adjustment cycles. *Id.*

VI. COMMISSION ANALYSIS

Based upon a review of the Postal Service’s filing, supporting workpapers, and the comments, the Commission rejects the changes in Proposal Eight for the reasons discussed below.

Pursuant to 39 U.S.C. § 3652(e)(2), improvements in the “quality, accuracy, or completeness of Postal Service data required by the Commission” may be initiated or entertained by the Commission if “the attribution of costs or revenues to products has become *significantly inaccurate* or can be *significantly improved*” or if “such revisions are, in the judgment of the Commission, otherwise *necessitated* by the public interest.”

¹⁴ Joint Comment of the DMA Nonprofit Federation and the Data & Marketing Association, September 18, 2017, at 2 (DMA Comments).

¹⁵ See Comments of the American Catalog Mailers Association (ACMA), September 18, 2017 (ACMA Comments); Public Representative Comments, September 18, 2017 (PR Comments).

39 U.S.C. § 3652(e)(2)(A), (C) (emphasis added).¹⁶ The Commission finds that none of the three provisions are met. The Postal Service has not shown that the current methodology is significantly inaccurate and a change in methodology is necessary. Likewise, the Postal Service has not shown that the proposed reversion to the subclass calculation of the 60 percent ratio would result in a significant improvement in the Postal Service's accounting methodology. Finally, the change is not necessitated by public interest and, in fact, the public interest militates against adoption of the proposal because of the potential of rate shock to nonprofit mailers.

Current methodology not significantly inaccurate and no evidence that proposal would result in significant improvement. Distortions not direct result of application of 60 percent rule at class level. The minor distortions in rates which give rise to the slower increases in nonprofit rates, vis-à-vis commercial rates, are likely driven by the changes in mail mix and preparation rather than a direct result of application of the 60 percent rule at the class level. As discussed below, those diversions have been relatively minor in scope, and the Postal Service has made ample and proper use of its pricing flexibility to ensure that these minor distortions did not affect stability in the nonprofit and commercial rate relationships.

Current nonprofit and commercial rate increases. As shown in Table 1, from Docket Nos. R2008-1 to R2017-1, nonprofit rates have increased approximately 3.0 percentage points less than commercial rates.

¹⁶ Additional grounds for data improvement occur when "the quality of service data has become significantly inaccurate or can be significantly improved", which is inapplicable here. 39 U.S.C. § 3652(e)(2)(B).

Table 1
Comparison of Nonprofit and Commercial Rate Changes

Docket No.	Marketing Mail Commercial	Marketing Mail Nonprofit
R2008-1	3.10%	0.70%
R2009-2	3.70%	4.50%
R2011-2	1.90%	0.50%
R2012-3	2.40%	-0.70%
R2013-1	2.40%	4.10%
R2013-10	1.60%	2.10%
R2015-4	1.80%	2.70%
R2016-2	0.00%	0.00%
R2016-5	0.00%	-0.10%
R2017-1	0.90%	1.20%
CUMULATIVE	19.00%	16.10%

During that same period, as shown in Table 2, the ratio of nonprofit to commercial revenue per piece has fluctuated. Typically the ratio is close to 60 percent in each rate case, which indicates that the Postal Service is using its pricing flexibility to adhere to the requirements of 39 U.S.C. § 3626(a)(6)(A). However, the ratio tends to be further from 60 percent when evaluated in the Annual Compliance Determination (ACD) subsequent to each rate case. This implies that mail mix changes are driving the changes in ratio.

Table 2
Class-Level Nonprofit to Commercial Revenue per Piece Ratio

Fiscal Year	ACD	Rate Case
FY 2007	62.0%	
FY 2008	60.7%	60.1%
FY 2009	60.0%	60.2%
FY 2010	60.5%	
FY 2011	59.4%	60.1%
FY 2012	58.2%	59.8%
FY 2013	58.7%	59.9%
FY 2014	59.0%	
FY 2015	59.0%	60.0%
FY 2016	59.2%	
FY 2017		60.0%

Because rates differ by rate category, changes in volume among rate categories (mail mix changes) lead to changes in average revenue. When mail volume shifts from lower rate categories to higher rate categories, the average revenue per piece increases. When mail volume shifts from higher rate categories to lower rate categories the average revenue per piece decreases. Since FY 2000, the last full year before the 60 percent rule was implemented; volume has shifted from origin mail, a higher rate category to lower rate dropship categories.

Table 3 highlights the increases in dropshipping for Regular Commercial mailpieces as well as Nonprofit ECR pieces.

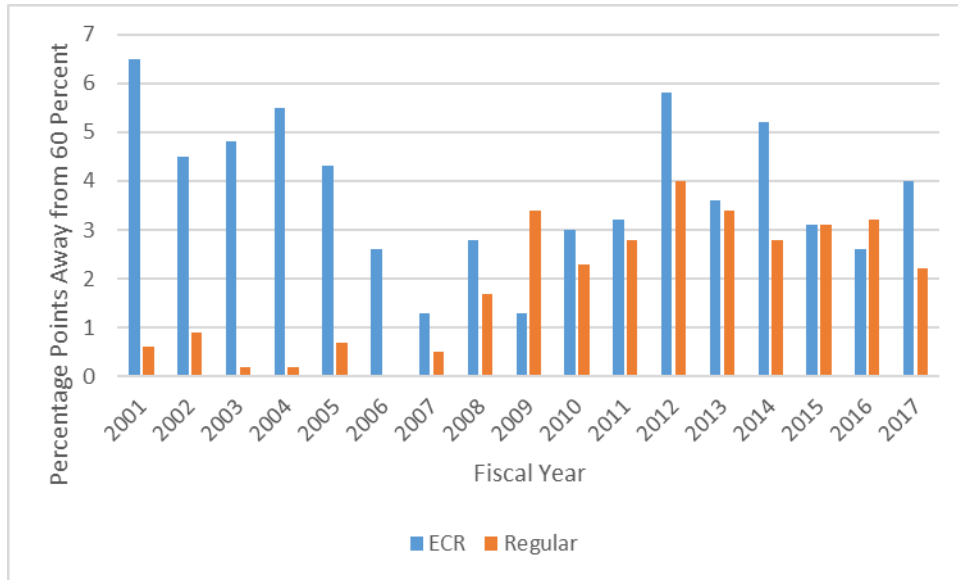
Table 3
Distortions Caused by Changes in Mail Mix

Shift in Regular Mail Mix 2000 - 2017			Shift in ECR Mail Mix 2000 - 2017		
	Commercial	Non Profit		Commercial	Non Profit
Origin	-45%	-36%	Origin	-22%	-18%
NDC	-14%	-6%	NDC	-10%	-20%
SCF	59%	42%	SCF	26%	46%
DDU	0%	0%	DDU	6%	-8%

Over the past 17 years, as the mail mix shifted toward more dropshipped volume, the average revenue per piece decreased. Table 3 demonstrates that dropshipping has increased faster for Commercial mail than for Nonprofit mail over the past 17 years. Specifically, mail dropshipped to the sectional center facility (SCF) increased 59 percent for Commercial mail, and 42 percent for Nonprofit mail. As a result commercial revenue per piece has declined at a faster rate than nonprofit revenue per piece. Consequently, to adhere to the 60 percent rule at the class level, nonprofit prices have had to increase less than commercial prices.

Divergence from 60 percent not significantly changed. Table 1 of the Postal Service's petition provides the subclass level ratio of nonprofit to commercial average revenue per piece from FY 2000 through FY 2017. Petition, Proposal Eight at 3. This table shows that in absolute terms the divergence from 60 percent has not significantly changed since passage of the PAEA. *Id.* Before FY 2007, when the 60 percent rule was applied at the subclass level, divergence from the ratio was still present. It also shows that the divergence from 60 percent has equalized between Regular and ECR after the passage of the PAEA. *Id.* Figure 1 illustrates this point.

Figure 1
Divergence in Ratio of Subclass Level Nonprofit to Commercial Average Revenue per Piece from FY 2001 through FY 2017



Source: See Petition, Proposal Eight at 3.

Ratio is in compliance. The Commission has found the nonprofit to commercial ratio compliant with the “as nearly as practicable, to 60 percent” standard set forth in 39 U.S.C. § 3626(a)(6)(A) in all ACDs. Table 4 shows how the Commission assessed compliance with the 60 percent statute every year since the passage of the PAEA.

Table 4
Historical Assessment of Compliance

Docket No.	Finding	Compliance Determination
Docket No. ACR2008, Annual Compliance Determination, March 30, 2009, at 63.	“Non-profit rates were set to yield per-piece revenues that are 60 percent of commercial revenues at the class level. The Commission calculates that in FY 2008 the actual per-piece revenue from Standard non-profit pieces was 60.7 percent of Standard commercial per-piece revenues. The law does not require actual non-profit revenues to equal exactly 60 percent of commercial revenues. It instead requires a forward-looking estimate when setting rates.”	Compliant
Docket No. ACR2009, Annual Compliance Determination, March 29, 2010, at 84.	“Section 3626(a)(6) requires that Standard Mail Nonprofit average revenue per piece equal ‘as nearly as practicable’ 60 percent of Standard Mail commercial average revenue per piece. Exactly achieving this target is difficult, as market dominant price adjustments are based on historical billing determinants. This task has been made more difficult by the inconsistency between the price adjustment process and the ACD process. Under the circumstances, 61 percent meets these nearly as practicable criterion.”	Compliant
Docket No. ACR2010, Annual Compliance Determination, March 29, 2011, at 115.	“In Docket No. R2009-2, Nonprofit prices were set to yield per-piece average revenues that were 60 percent of commercial per-piece average revenues at the class level. The Commission calculates that in FY 2010, the actual per-piece revenue from Standard Mail Nonprofit pieces was 61.3 percent of Standard Mail commercial per-piece revenue...[t]he prices approved in Docket No. R2011-2 are expected to produce average per-	Compliant

	piece revenue for... Commercial mail. As such, the Commission does not need to take action in regard to Nonprofit prices.”	
Docket No. ACR2011, Annual Compliance Determination, March 28, 2012, at 128.	“In Docket No. R2011-2, Nonprofit prices were set to yield per-piece average revenues that were 60 percent of commercial per-piece revenues at the class level. The Commission calculates that in FY 2011, the actual per-piece revenue from Standard Mail Nonprofit pieces was 56.38 percent of Standard Mail commercial per piece revenue. The prices approved in Docket No. R2012-3 are expected to produce average per-piece revenue for Nonprofit mail equal to 60 percent of the average per-piece revenue for Commercial mail. No remedial action, therefore, is warranted.”	Compliant
Docket No. ACR2012, Annual Compliance Determination, March 28, 2013, at 124-125.	“In Docket No. R2012-3, nonprofit prices were set to yield per-piece average revenues that were 60 percent of commercial per piece average revenues at the class level. The Commission calculates that in FY 2012, the actual per piece revenue from Standard Mail nonprofit pieces was 58.97 percent of Standard Mail commercial per piece revenue. The prices approved in Docket No. R2013-1 are expected to produce average per piece revenue for nonprofit mail equal to 60 percent of the average per-piece revenue for commercial mail. No action, therefore, is warranted.”	Compliant
Docket No. ACR2013, Annual Compliance Determination, March 27, 2014, at 39.	“In Docket No. R2013-1, nonprofit prices were set to yield per-piece average revenues that were 60 percent of commercial per-piece average revenues at the class level. The Commission calculates that in FY 2013, the actual per-piece revenue from	Compliant

	Standard Mail nonprofit pieces was 59.7 percent of Standard Mail commercial per-piece revenue. The Commission finds that in FY 2013, prices were in compliance with all the preferred rate requirements identified in 39 U.S.C. 3626.” (cite omitted).	
Docket No. ACR2014, Annual Compliance Determination, March 27, 2015, at 32	“In Docket No. R2013-11, nonprofit prices were set to yield average per-piece revenues of 60.1 percent of commercial per-piece revenues at the class level. The Commission calculates that the actual per-piece revenue from Standard Mail nonprofit pieces was 57.9 percent in FY 2014. Changes in the mix of mail after price changes make it difficult to precisely attain the 60 percent relationship required by law. The Commission finds that prices in FY 2014 were in compliance with all the preferred rate requirements identified in 39 U.S.C. § 3626.”	Compliant
Docket No. ACR2015, Annual Compliance Determination, March 28, 2016, at 41.	“In Docket No. R2015-4, nonprofit prices were set to yield average per-piece revenues of 60.2 percent of commercial per-piece revenues at the class level. The Commission calculates that the actual per-piece revenue from Standard Mail nonprofit pieces was 59.0 percent in FY 2015. Changes in the mix of mail after price changes make it difficult to precisely attain the 60 percent relationship required by law. The Commission finds that prices in FY 2015 were in compliance with all of the preferred rate requirements identified in 39 U.S.C. § 3626.” (cite omitted).	Compliant
Docket No. ACR 2016, Annual Compliance Determination, March 28, 2017, at 41.	“In Docket No. R2015-4, nonprofit prices were set to yield average per-piece revenues of 60.2 percent of commercial per-piece revenues at the class level. The Commission calculates that the actual per-piece revenues from	Compliant

	Standard Mail nonprofit pieces were 59.1 percent of the per-piece revenues of their commercial counterparts in FY 2016. Changes in the mix of mail after price changes make it difficult to precisely attain the 60 percent relationship required by law. The Commission finds that prices in FY 2016 were in compliance with all of the preferred rate requirements identified in 39 U.S.C. § 3626.” (cite and footnote omitted).	
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These findings demonstrate that the Commission has afforded the Postal Service latitude and flexibility in its application of the “as nearly as practicable, to 60 percent” standard. It has never required exact adherence to the 60 percent number because of a recognition that the timing issues between when final rates are adopted and the compliance determination make the number somewhat of a moving target. Since FY 2008, the furthest divergence from the 60 percent standard has been 58.2 percent on the low end in the FY 2012 ACD and 60.7 percent on the high end in the FY 2008 ACD. Petition, Proposal Eight at 3. These relatively small swings demonstrate that applying the revenues per piece at a subclass level would lead neither to a significant improvement in the Postal Service’s accounting nor enhanced compliance with the statute.

Additionally, as all the parties acknowledge, the passage of the PAEA eliminated the subclass level distinction for ratemaking. Although the Postal Service may still collect some data internally at the subclass level, the Commission and stakeholders have moved away from evaluating products on a subclass basis. The Postal Service’s initial rationale for moving from the subclass application to class level application in Docket No. R2008-1 remains as true today as it was in 2008. See Order No. 66 at 32. A reversion to subclass-level accounting would not only represent a step backward in

the evolution of PAEA's intended "modern system for regulating rates and classes,"¹⁷ it could lead to further confusion as to whether the new system of measuring subclasses could be compared to a category that still exists as a product. This consideration also weighs against applying revenues per piece at a subclass level since it would not constitute a significant improvement over the status quo.

Public interest. Nonprofit mailers contend that acceptance of the Petition would have dire effects on their missions and ability to use the mail. In response to concerns about rate shock among nonprofit mailers, the Postal Service has proposed some theoretical approaches to phasing in its proposal over time. See January 3, 2018 Response to CIR No. 1. However, the Postal Service has not committed to a defined phasing schedule and notes that in some cases, it may find it necessary to terminate the phasing mid-cycle once an interim target was achieved. This approach would contravene the objective of predictability and stability in rates pursuant to 39 U.S.C. § 3622(b)(2). As such, the Commission finds that the overall public interest weighs against accepting a methodology change.

For the reasons stated above, the Commission rejects the Postal Service's Proposal Eight proposed changes in analytical principles.

VII. ORDERING PARAGRAPH

It is ordered:

For purposes of periodic reporting to the Commission, the Postal Service's Proposal Eight changes in analytical principles are rejected.

By the Commission.

Stacy L. Ruble
Secretary

¹⁷ 39 U.S.C. § 3622(a).

LIST OF COMMENTERS AND COMMENTS

Commenter	Citation	Citation Short Form
ALEH Israel Foundation (AIF)	Comments of ALEH Israel Foundation, September 18, 2017	AIF Comments
ALEH Israel Foundation (AIF)	Comments of Dov Hirth, September 18, 2017	Hirth Comments
Alliance of Nonprofit Mailers (ANM)	Comments of Alliance of Nonprofit Mailers, September 18, 2017	ANM Comments
Alliance of Nonprofit Mailers (ANM)	Response of Alliance of Nonprofit Mailers to Reply Comments of United States Postal Service, October 3, 2017	ANM Response
American Cancer Society (ACS)	Comments of American Cancer Society, September 18, 2017	ACS Comments
American Catalog Mailers Association (ACMA)	Comments of the American Catalog Mailers Association, September 18, 2017	ACMA Comments
American Committee for the Weizmann Institute of Science (ACWIS)	Comments of Mark Feldman, September 18, 2017	Feldman Comments
American Committee for the Weizmann Institute of Science (ACWIS)	Comments of Marshall Levin, September 18, 2017	Levin Comments
American Friends of Migdal Ohr (AFMO)	Comments of American Friends of Migdal Ohr, September 18, 2017	AFMO Comments
American Institute for Cancer Research (AICR)	Comments of American Institute for Cancer Research, September 18, 2017	AICR Comments
American Kidney Fund (AKF)	Comments of American Kidney Fund, September 20, 2017	AKF Comments
American Lung Association (ALA)	Comments of American Lung Association, September 18, 2017	ALA Comments
American Sephardi Federation (ASF)	Comments of American Sephardi Federation, September 12, 2017	ASF Comments

Commenter	Citation	Citation Short Form
American Society for the Prevention of Cruelty to Animals (ASPCA)	Comments of American Society for the Prevention of Cruelty to Animals, September 18, 2017	ASPCA Comments
Americares (Americares)	Comments of Americares, September 25, 2017	Americares Comments
amfAR, The Foundation for AIDS Research (amfAR)	Comments of amfAR, The Foundation for AIDS Research, September 18, 2017	amfAR Comments
Appalachian Mountain Club (AMC)	Comments of Appalachian Mountain Club, September 12, 2017	AMC Comments
Atlanta Humane Society (AHS)	Comments of Atlanta Humane Society, September 18, 2017	AHS Comments
Best Friends Animal Society (BFAS)	Comments of Best Friends Animal Society, September 18, 2017	BFAS Comments
Black Warrior Riverkeeper (BWR)	Comments of Black Warrior Riverkeeper, September 18, 2017	BWR Comments
Boise Rescue Mission Ministries (BRMM)	Comments of Boise Rescue Mission Ministries, September 25, 2017	BRMM Comments
Bright Focus Foundation (BFF)	Comments of Bright Focus Foundation, September 18, 2017	BFF Comments
Chesapeake Bay Foundation (CBF)	Comments of Chesapeake Bay Foundation, September 12, 2017	CBF Comments
Children's Health, Children's Medical Center Foundation	Comments of Joshua McLemore, September 18, 2017	McLemore Comments
Children's Health, Children's Medical Center Foundation	Comments of Lori Waggoner, September 18, 2017	Waggoner Comments
Compassion International (CI)	Comments of Compassion International, September 19, 2017	CI Comments
Consumer Reports (CR)	Comments of Consumer Reports, September 18, 2017	CR Comments

Commenter	Citation	Citation Short Form
Coosa Riverkeeper (Coosa)	Comments of Coosa Riverkeeper, September 18, 2017	Coosa Comments
DonorVoice (DV)	Comments of DonorVoice, September 18, 2017	DV Comments
DMA Nonprofit Federation and Data & Marketing Association (DMA)	Joint Comment of the DMA Nonprofit Federation and the Data & Marketing Association, September 18, 2017	DMA Comments
Easterseals (Easterseals)	Comments of Easterseals, September 18, 2017	Easterseals Comments
The Elks Magazine (Elks)	Comments of The Elks Magazine, September 19, 2017	Elks Comments
Esophageal Cancer Action Network (ECAN)	Comments of Esophageal Cancer Action Network, September 14, 2017	ECAN Comments
Food for the Poor, Inc. (FFP)	Comments of Food for the Poor, September 13, 2017	FFP Comments
Franciscan Mission Associates (FMA)	Comments of Franciscan Mission Associates, September 19, 2017	FMA Comments
Friends for Animals of Metro Detroit (FAMD)	Comments of Friends for Animals of Metro Detroit, September 15, 2017	FAMD Comments
Friends of the High Line (FHL)	Comments of Friends of the High Line, September 12, 2017	FHL Comments
Galapagos Conservancy Trust (GCT)	Comments of Galapagos Conservancy Trust, September 14, 2017	GCT Comments
Guideposts (Guideposts)	Comments of Guideposts, September 25, 2017	Guideposts Comments
The Home for Little Wanderer (THLW)	Comments of The Home for Little Wanderer, September 18, 2017	THLW Comments
Humane Society of Charlotte (HSC)	Comments of Humane Society of Charlotte, September 18, 2017	HSC Comments
InnerWorkings (IW)	Comments of InnerWorkings, September 15, 2017	IW Comments

Commenter	Citation	Citation Short Form
International Fellowship of Christians and Jews (IFCJ)	Comments of International Fellowship of Christians and Jews, September 18, 2017	IFCJ Comments
Kids Wish Network (KWN)	Comments of Kids Wish Network, September 18, 2017	KWN Comments
Little Shelter Animal Rescue and Adoption Center (LSARAC)	Comments of Little Shelter Animal Rescue and Adoption Center, September 12, 2017	LSARAC Comments
Make-A-Wish Foundation of America (Make-A-Wish)	Comments of Make-A-Wish Foundation of America, September 18, 2017	Make-A-Wish Comments
Maryknoll Fathers and Brothers (MFB)	Comments of Maryknoll Fathers and Brothers, September 11, 2017	MFB Comments
Maryland Food Bank (MFB)	Comments of Maryland Food Bank, September 19, 2017	MFB Comments
Meals on Wheels, Spokane	Comments of Mollie Dalpae, September 12, 2017	Dalpae Comments
Meals on Wheels, Central Texas	Comments of Adam I. Hauser, September 19, 2017	Hauser Comments
Meals on Wheels, West	Comments of Chris Baca, September 12, 2017	Baca Comments
Meals on Wheels, Western New York	Comments of Tara A. Ellis, September 15, 2017	Ellis Comments
Mercy Home for Boys & Girls (Mercy Home)	Comments of Mercy Home for Boys & Girls, September 18, 2017	Mercy Home Comments
Miracle Flights (MF)	Comments of Miracle Flights, September 18, 2017	MF Comments
Mothers Against Drunk Driving (MADD)	Comments of Mothers Against Drunk Driving, September 25, 2017	MADD Comments
Muscular Dystrophy Association (MDA)	Comments of Muscular Dystrophy Association, October 2, 2017	MDA Comments

Commenter	Citation	Citation Short Form
National Catholic Development Conference (NCDC)	Comment of National Catholic Development Conference, September 18, 2017	NCDC Comments
National Cancer Center, Inc. (NCC)	Comments of National Cancer Center, Inc., September 19, 2017	NCC Comments
The National Children's Center Society (NCCS)	Comments of The National Children's Center Society, September 12, 2017	NCCS Comments
National Committee to Preserve Social Security and Medicare (NCPSSM)	Comments of National Committee to Preserve Social Security and Medicare, September 18, 2017	NCPSSM Comments
National Emergency Medicine Association (NEMA)	Comments of National Emergency Medicine Association, September 11, 2017	NEMA Comments
National Foundation for Cancer Research (NFCR)	Comments of National Foundation for Cancer Research, September 12, 2017	NFCR Comments
National Park Foundation (NPF)	Comments of National Park Foundation, September 14, 2017	NPF Comments
National Wildlife Federation (NWF)	Comments of National Wildlife Federation, September 19, 2017	NWF Comments
The National WWII Museum, New Orleans (NWWIIM)	Comments of The National WWII Museum in New Orleans, September 15, 2017	NWWIIM Comments
The Nature Conservancy (TNC)	Comments of The Nature Conservancy, September 18, 2017	TNC Comments
New York Botanical Garden (NYBG)	Comments of Cathy Alexander, September 18, 2017	Alexander Comments
New York Botanical Garden (NYBG)	Comments of Lynette Ardis, September 18, 2017	Ardis Comments
New York Botanical Garden (NYBG)	Comments of Lizette Baldeo, September 18, 2017	Baldeo Comments
New York Botanical Garden (NYBG)	Comments of Garrett Barziloski, September 18, 2017	Barziloski Comments

Commenter	Citation	Citation Short Form
New York Botanical Garden (NYBG)	Comments of Henry Cabrera, September 18, 2017	Cabrera Comments
New York Botanical Garden (NYBG)	Comments of Rebecca Charney, September 18, 2017	Charney Comments
New York Botanical Garden (NYBG)	Comments of Stephan Chenault, September 18, 2017	Chenault Comments
New York Botanical Garden (NYBG)	Comments of Marion Co, September 18, 2017	Co Comments
New York Botanical Garden (NYBG)	Comments of Samantha Conlan, September 18, 2017	Conlan Comments
New York Botanical Garden (NYBG)	Comments of Sarah DuPont, September 18, 2017	DuPont Comments
New York Botanical Garden (NYBG)	Comments of Catherine Farrell, September 18, 2017	Farrell Comments
New York Botanical Garden (NYBG)	Comments of Rita Galante, September 18, 2017	Galante Comments
New York Botanical Garden (NYBG)	Comments of Frances Hall, September 18, 2017	Hall Comments
New York Botanical Garden (NYBG)	Comments of Stephen Hanson, September 18, 2017	Hanson Comments
New York Botanical Garden (NYBG)	Comments of Chris Kozarich, September 18, 2017	Kozarich Comments
New York Botanical Garden (NYBG)	Comments of Lauren McKie, September 18, 2017	McKie Comments
New York Botanical Garden (NYBG)	Comments of Benjamin Lipnick, September 18, 2017	Lipnick Comments
New York Botanical Garden (NYBG)	Comments of Gale Page, September 18, 2017	Page Comments
New York Botanical Garden (NYBG)	Comments of Marci Silverman, September 18, 2017	Silverman Comments

Commenter	Citation	Citation Short Form
New York Botanical Garden (NYBG)	Comments of Susan Stanford, September 18, 2017	Stanford Comments
New York Botanical Garden (NYBG)	Comments of Lauren Turchio, September 18, 2017	Turchio Comments
New York Botanical Garden (NYBG)	Comments of Mercer Warriner, September 18, 2017	Warriner Comments
New York Botanical Garden (NYBG)	Comments of Stephanie Williams, September 18, 2017	Williams Comments
NJAPF Graphic Design	Comments of Irv Cohen, September 18, 2017	Cohen Comments
North Shore Animal League America (NSALA)	Comments of North Shore Animal League America, September 18, 2017	NSALA Comments
Orbis International (OI)	Comments of Orbis International, September 18, 2017	OI Comments
Ocean Conservancy (OC)	Comments of Ocean Conservancy, October 14, 2017	OC Comments
Oregon Humane Society (OHS)	Comments of Oregon Humane Society, September 18, 2017	OHS Comments
Our Sunday Visitor, Inc. (OSV)	Comments of Our Sunday Visitor, September 12, 2017	OSV Comments
Physicians Committee for Responsible Medicine (PCRM)	Comments of Physicians Committee for Responsible Medicine, September 20, 2017	PCRM Comments
Potomac Conservancy, Inc.	Comments of Potomac Conservancy, Inc., September 15, 2017	PCI Comments
Production Solutions (PS)	Comments of Production Solutions, September 18, 2017	PS Comments
Public Representative (PR)	Public Representative Comments, September 18, 2017	PR Comments
Rainforest Action Network (RAN)	Comments of Rainforest Action Network, September 13, 2017	RAN Comments

Commenter	Citation	Citation Short Form
Riverkeeper (Riverkeeper)	Comments of Riverkeeper, September 25, 2017	Riverkeeper Comments
RMI Direct Marketing Inc. (RMI)	Comments of RMI Direct Marketing Inc., September 25, 2017	RMI Comments
Rosie's Place (Rosie's)	Comments of Rosie's Place, September 29, 2017	Rosie's Comments
The Salvation Army (SA)	Comments of The Salvation Army, September 18, 2017	SA Comments
Santa Barbara Channelkeeper (SBC)	Comments of Santa Barbara Channelkeeper, September 18, 2017	SBC Comments
Society for the Prevention of Cruelty to Animals (SPCA)	Comments of Society for the Prevention of Cruelty to Animals, September 18, 2017	SPCA Comments
Special Olympics	Comments of Tyler Hall, September 12, 2017	Hall Comments
Special Olympics	Comments of Shira Mitchel, September 12, 2017	Mitchel Comments
Special Olympics	Comments of Stefanie Sempek, September 12, 2017	Sempek Comments
St. Bonaventure Indian Mission & School	Comments of St. Bonaventure Indian Mission & School, September 12, 2017	St. Bonaventure Comments
St. Hubert's Animal Welfare Center	Comments of St. Hubert's Animal Welfare Center, September 20, 2017	St. Hubert's Comments
United States Postal Service (Postal Service)	Reply Comments of the United States Postal Service Regarding Proposal Eight, September 26, 2017	Postal Service Reply Comments
USA Shooting (USA)	Comments of USA Shooting, September 15, 2017	USA Comments
Visiting Nurse Service of New York (VNSNY)	Comments of Visiting Nurse Service of New York, September 13, 2017	VNSNY Comments

Commenter	Citation	Citation Short Form
Washington Educational Television Association (WETA)	Comments of Washington Educational Television Association, September 12, 2017	WETA Comments
Wounded Warrior Project (WWP)	Comments of Wounded Warrior Project, September 15, 2017	WWP Comments
The Young Men's Christian Association (YMCA)	Comments of The Young Men's Christian Association, September 15, 2017	YMCA Comments