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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

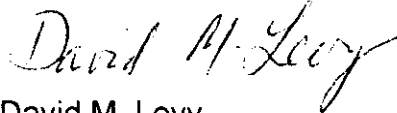
Docket No. R2000-1

Postal Rate and Fee Changes, 2000

**FIRST INTERROGATORIES OF ALLIANCE OF NONPROFIT MAILERS
TO USPS WITNESS MOELLER (ANM/USPS-T35-1-6)**

Pursuant to section 20 of the Commission's Rules of Practice, the Alliance of Nonprofit Mailers ("ANM") respectfully submits the attached interrogatories and document requests to USPS witness Joseph D. Moeller (USPS-T-35). ANM incorporates by reference the instructions in OCA interrogatories OCA/USPS-1-14 (filed Jan. 24, 2000).

Respectfully submitted,



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QUESTIONS

ANM/USPS-T35-1. This question refers to page 36 of your testimony, where you state that the Postal Service's proposed rates reflect the assumption that Congress will enact legislation capping the average rate increase for nonprofit ECR Standard (A) mail "to keep the percentage increase within 10 percentage points of commercial." Please confirm that the Commission cannot both accept the Postal Service's cost estimates and recommend the Postal Service's proposed rates unless Congress changes the law. If you fail to confirm, please explain fully.

ANM/USPS-T35-2. Please produce a table showing the rate changes for nonprofit ECR Standard (A) mail that would follow from the Postal Service's proposed cost estimates if the existing statutory constraints on preferred rates remain unchanged. Please use a format comparable to "Standard Mail Rate Schedule [321.3] 322" (USPS Request, Attachment B, page 17).

ANM/USPS-T35-3. Does the Postal Service contend that its Rate Request and supporting documentation provide an adequate basis for the Commission to recommend rates for nonprofit ECR Standard (A) mail if the existing statutory constraints on preferred rates remain unchanged?

(a) If so, please produce a table, in a format comparable to "Standard Mail Rate Schedule [321.3] 322" (USPS Request, Attachment B, page 17), showing the rates that the Postal Service believes could be lawfully recommended by the Commission.

(b) If not, please specify in detail what must be added to the Postal Service's filing before the Commission can lawfully recommend rates under the existing statutory constraints.

ANM/USPS-T35-4. In the Postal Service's view, what characteristics of nonprofit ECR Standard (A) mail have caused its unit costs to increase faster than those of commercial ECR Standard (A) mail from the base year in Docket No. R97-1 to the base year in Docket No. R2000-1 (FY 1998)? Produce all studies, analyses and similar documents that support your answer.

ANM/USPS-T35-5. Please identify each characteristic of nonprofit ECR Standard (A) mail that the Postal Service has studied, investigated or analyzed since Docket No. R97-1 as a possible cause of the relatively rapid cost increases attributed to the subclass by the Postal Service in this docket. Produce all documents relating to each such study, investigation or analysis.

ANM/USPS-T35-6. Please produce all memoranda, correspondence or other communications created by in-house or outside economists or cost analysts for Postal Service headquarters since July 1, 1998, concerning possible causes of the relatively rapid cost increases attributed to nonprofit ECR Standard (A) mail by the Postal Service's costing systems.

CERTIFICATE OF SERVICE

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



February ¹⁶/~~4~~, 2000