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BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, DC 20268-0001  
POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

Postal Rate And Fee Changes, 1997

Docket No. R97-1

**INTERROGATORIES OF  
ALLIANCE OF NONPROFIT MAILERS  
TO USPS WITNESS GEORGE TOLLEY  
(ANM/USPS-T6-1-3)  
August 4, 1997**

Pursuant to sections 25 and 26 of the Commission's Rules of Practice, the Alliance of Nonprofit Mailers ("ANM") respectfully submits the attached interrogatories and requests for production of documents. Instructions for these questions appear in Appendix A.

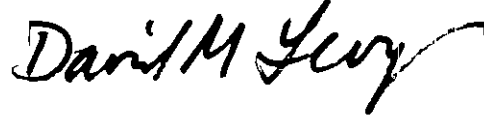
**ANM/USPS-T6-1** With respect to the before rates Test Year forecast for nonprofit Standard A ECR mail, what price inputs did you use?

**ANM/USPS-T6-2** With respect to the after rates Test Year forecast for nonprofit Standard A ECR mail, what price inputs did you use?

**ANM/USPS-T6-3** In view of the fact that all proposed nonprofit Step 6 Standard A ECR rates are less than existing rates, please explain the major reasons why the Test Year After-Rates

volume (13,122.251 million) shown in your Table 1 is less than the Before-Rates volume (13,255.224 million). Identify all studies, analyses, compilations and other data on which you rely, and produce any such data that the Postal Service has not yet produced in this case.

Respectfully submitted,

A handwritten signature in black ink that reads "David M. Levy". The signature is fluid and cursive, with a long, sweeping underline that extends to the right.

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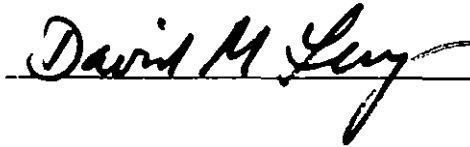
August 4, 1997

## INSTRUCTIONS

1. If the designated witness cannot answer a question, please redirect it to another witness who can.
2. If the requested data cannot be produced with reasonable effort in the exact format or level of detail requested, please produce all data available in (1) a substantially similar format or level of detail, or (2) susceptible to being converted to the requested format and detail.
3. The term "documents" includes, but is not limited to: letters, telegrams, memoranda, reports, studies, newspaper clippings, speeches, testimony, pamphlets, charts, tabulations, and workpapers. Documents also include information on computer media, microfilm and other non-paper media.
4. Responses to requests for explanations or the derivation of numbers should be accompanied by workpapers. Workpapers shall include sufficient backup material to enable a third party to replicate the final results from the primary sources. Where arithmetic manipulations were performed by a computer with internally stored instructions, and no English language intermediate printouts were prepared, the arithmetic steps should be replicated by manual or other means.

## 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.

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August 4, 1997