

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

Postal Rate and Fee Changes, 2005

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Docket No. R2005-1

**FIRST INTERROGATORIES
OF ALLIANCE OF NONPROFIT MAILERS
TO USPS WITNESS TAUFIQUE
(ANM/USPS-T28-1-2)
(August 30, 2005)**

Pursuant to sections 25 and 26 of the Commission's Rules of Practice, the Alliance of Nonprofit Mailers ("ANM") respectfully submits the attached interrogatories to the USPS. These requests concern the revised answers of USPS witness Altaf H. Taufique, filed on August 24, 2005, to Valpak interrogatories VP/USPS-T28-52 through -55. The interrogatories and answers concern the ratio of nonprofit revenue per piece to commercial revenue per piece (as defined in 39 U.S.C. § 3626(a)(6)(B)) that the USPS expects to generate from its proposed rates for each subclass of Standard Mail.

Respectfully submitted,

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August 30, 2005

DISCOVERY REQUESTS

ANM/USPS-T28-1. According to the August 24, 2005, revised answer of USPS witness Taufique to Valpak interrogatory VP/USPS-T28-52, the USPS expects that the rates it is proposing for the Enhanced Carrier Route (“ECR”) subclass of nonprofit Standard Mail will produce average revenue of \$0.1007 per piece under the assumptions specified in 39 U.S.C. § 3626(a)(6)(B)—*i.e.*, approximately 56.4 percent of the average revenue per piece that the USPS expects to receive from its proposed rates for the ECR subclass of commercial Standard Mail.

- (a) Please provide a table of the rates that would result if the USPS raised its proposed rates for the ECR subclass of nonprofit Standard Mail enough to generate average revenue per piece exactly equal (except for any departures required by the tenth-of-a-cent rounding convention for individual rate elements) to 60 percent of the average revenue per piece that the USPS expects to receive from its proposed rates for the ECR subclass of commercial Standard Mail.
- (b) Please quantify the net increase in Test Year revenue that the rate adjustments responsive to question (a) would generate. If you cannot give a precise figure, give your best estimate.
- (c) Please produce workpapers and documentation sufficient to verify your responses to parts (a) and (b).

ANM/USPS-T28-2. According to the August 24, 2005, revised answer of USPS witness Taufique to Valpak interrogatory VP/USPS-T28-52, the USPS expects that the rates it is proposing for the regular subclass of nonprofit Standard Mail will produce average revenue of \$0.1389 per piece under the assumptions specified in 39 U.S.C. § 3626(a)(6)(B)—*i.e.*, approximately 60.9 percent of the average revenue per piece that the USPS expects to receive from its proposed rates for the regular subclass of commercial Standard Mail.

- (a) Please provide a table of the rates that would result if the USPS reduced its proposed rates for the regular subclass of nonprofit Standard Mail

enough to generate average revenue per piece exactly equal (except for any departures required by the tenth-of-a-cent rounding convention for individual rate elements) to 60 percent of the average revenue per piece that the USPS expects to receive from its proposed rates for the regular subclass of commercial Standard Mail.

- (b) Please quantify the net reduction in Test Year revenue that the rate adjustments responsive to question (a) would produce. If you cannot give a precise figure, give your best estimate.
- (c) Please produce workpapers and documentation sufficient to verify your responses to parts (a) and (b).