

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, DC 20268-0001

Postal Rate and Fee Changes, 2005 ) Docket No. R2005-1

**MOTION OF ALLIANCE OF NONPROFIT MAILERS  
FOR LEAVE TO FILE INTERROGATORIES CONCERNING  
REVISED RESPONSES OF USPS WITNESS TAUFIQUE  
TO VALPAK INTERROGATORIES VP/USPS-T28-52-55  
(August 30, 2005)**

The Alliance of Nonprofit Mailers (“ANM”) respectfully requests leave to submit interrogatories ANM/USPS-T28-1 and -2 to the Postal Service. ANM has filed the interrogatories separately today., concern the revised answers

The interrogatories follow up the revised answers of USPS witness Altaf H. Taufique to Valpak interrogatories VP/USPS-T28-52 through -55. The Valpak interrogatories 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. The Postal Service filed the revised answers on August 24, one day after the cutoff date for discovery to the USPS with respect to the direct testimony of intervenors such as Valpak.

ANM believes that information about the financial significance of the departures of the rates proposed by the Postal Service from the 60 percent standard established by 39 U.S.C. § 3626(a)(6)(A) will assist the Commission in

determining whether the proposed rates for commercial and nonprofit Standard Mail comply with the statutory ratio.

Respectfully submitted,

David M. Levy  
SIDLEY AUSTIN BROWN & WOOD LLP  
1501 K Street, N.W.  
Washington DC 20005-1401  
(202) 736-8214  
[dlevy@sidley.com](mailto:dlevy@sidley.com)

*Counsel for Alliance of Nonprofit Mailers*

August 30, 2005