

DOCKET SECTION

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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POSTAL RATE AND FEE CHANGES, 1997

POSTAL RATE AND FEE CHANGES  
OFFICE OF THE CLERK  
Docket No. R97-1

UNITED STATES POSTAL SERVICE  
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO  
THE ALLIANCE OF NONPROFIT MAILERS WITNESS HALDI  
(USPS/ANM-T1-20-29)


Pursuant to rules 25 and 26 of the Rules of Practice and Procedure and rule 2 of the Special Rules of Practice, the United States Postal Service directs the following interrogatories and requests for production of documents to the Alliance of Nonprofit Mailers witness Haldi: USPS/ANM-T1-20-29.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

  
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January 27, 1998

USPS/ANM-T1-20. Please state any and all reasons why a mailing paid at commercial rates would be permitted to be entered into the mailstream bearing "nonprofit evidencing of postage"?

USPS/ANM-T1-21. Please specify which "accounting records" collect Standard (A) revenue data and aggregate mail processing costs, as you indicate on page 34 of your testimony, and describe in detail your understanding of how this is done.

USPS/ANM-T1-22. At page 37, footnote 19 of your testimony, you indicate that the Office of Inspector General's Semiannual Report to Congress, FY 1997, Volume 1, "cites 79 Revenue Investigations against nonprofit organizations during the six-month period October 1, 1996 to March 31, 1997." Please confirm that you determined this figure by summing the listing of Revenue Investigations which indicated they were related to Nonprofit mailings, from pages 50-53 of the Semiannual Report. If you do not confirm, please explain fully.

USPS/ANM-T1-24. Please explain the source of each volume figure shown on page 42, lines 11-19 of your testimony, including citations and/or calculations used to arrive at each number. For all estimates that you derive from sample data, please provide 95 percent confidence intervals.

USPS/ANM-T1-25. Please refer to page 42, lines 20-21 of your testimony.

Please show how the 3.5 percent annual compound rate of growth in volume of nonprofit bulk mail was calculated or derived.

USPS/ANM-T1-26. Please refer to Exhibit 1-ANM-T1 of your testimony, where you summarize the results of a survey conducted by ANM under your supervision. For each responding organization that mailed Standard A regular rate mail with a nonprofit indicia, please provide:

- a. the name of the organization;
- b. the organization's address;
- c. the number of pieces entered at regular rates with nonprofit indicia;  
and
- d. the name of the Postal facility(ies) where the mailing(s) were entered.

USPS/ANM-T1-27. Please refer to page 43, lines 1-2 of your testimony, where you "estimate that at least two-thirds [of nonprofit bulk mail paying regular rates] had nonprofit evidencing of postage paid." Please provide a complete derivation for this estimate. If you derive this estimate from sample data, please provide 95 percent confidence intervals for the estimate.

USPS/ANM-T1-28. Please confirm that, according to the ANM survey conducted under your supervision, almost two-thirds of the pieces of bulk nonprofit mail

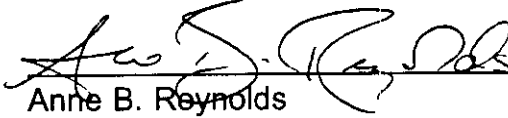
entered at commercial rates had “regular rate evidencing of postage paid”, i.e.  $1,032,099/(1,032,099+586,652)$ . If you do not confirm, please explain fully.

USPS/ANM-T1-29. Regarding Exhibit 1 to your testimony, which describes the survey you conducted of nonprofit mailers:

- a. You indicate that you cannot determine how many nonprofit organizations actually received the survey. Please provide the number of surveys that were initially faxed, e-mailed and mailed.
- b. How many of the surveys were mailed to “‘umbrella’ nonprofit organizations”?
- c. How many of the surveys were originally returned incomplete?
- d. Were any of the survey questions more likely than others to be left incomplete? Please explain fully.
- e. When survey forms were returned incomplete, please describe fully the procedures you used to supplement the responses.
- f. Did you or ANM contact non-respondents? Which ones? Please explain fully your procedures for doing so.
- g. How many more responses have you received since your testimony was completed?

## CERTIFICATE OF SERVICE

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

  
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