

DOCKET SECTION

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

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DEPT. OF JUSTICE
OFFICE OF THE ATTORNEY GENERAL

POSTAL RATE AND FEE CHANGES, 1997

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-T1-35-40)

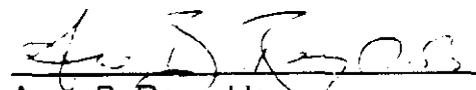
Pursuant to rules 25 and 26 of the Rules of Practice and Procedure and rule 2 of the Special Rules of Practice, the United States Postal Service directs the following interrogatories and requests for production of documents to the Alliance of Nonprofit Mailers witness Haldi: USPS/ANM-T1-35-40.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


Anne B. Reynolds

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2970; Fax -5402
January 28, 1998

USPS/ANM-T1-35. Please update the results of the survey you conducted on nonprofit Standard (A) mailers, to reflect survey responses that you received since completing your testimony.

USPS/ANM-T1-36. Please provide the information requested in USPS/ANM-T1-26, for the survey responses you received since completing your testimony.

USPS/ANM-T1-37. Please confirm that some mailers mail both nonprofit and regular rate Standard (A) mail.

a. Do you consider it possible that some mailers could endorse pieces as regular rate when they intend to mail them at nonprofit rates?

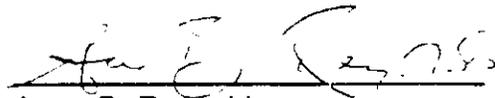
USPS/ANM-T1-38. Please indicate all bases for the statement you make in footnote 17 to your testimony, including any quantitative support you have.

USPS/ANM-T1-39. What, in your opinion, are the characteristics of nonprofit Standard (A) letters that make their costs so much lower than regular rate Standard (A) letters (for example, USPS-LR-H-106, page II-5, indicates that the unit cost for nonprofit is 4.6 cents, while the unit cost for regular rate is 5.3 cents)?

USPS/ANM-T1-40. Please refer to your testimony, at page 39, where you describe a situation where "nonprofit organizations may have prepared a mailing using nonprofit evidence of postage, only to have the Postal Service demand payment of the full regular rates before allowing the mail to be entered." Please estimate the costs to a nonprofit mailer in this circumstance, if he or she were required to provide proper evidence of postage prior to entering that mail.

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.

A handwritten signature in cursive script, appearing to read "Anne B. Reynolds", is written over a horizontal line.

Anne B. Reynolds

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