

DOCKET SECTION

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

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Docket No. R97-1

Postal Rate and Fee Changes, 1997

**OBJECTIONS OF ALLIANCE OF NONPROFIT MAILERS
TO INTERROGATORIES USPS/ANM-T1-41 AND -42
(February 20, 1998)**

The Alliance of Nonprofit Mailers ("ANM") objects to interrogatories USPS/ANM-T1-41 and USPS/ANM-T1-42, both of which were served by the Postal Service on February 12, 1998. Both interrogatories concern the mailer survey data summarized in the testimony of ANM witness Haldi. Interrogatory USPS/ANM-T1-41 and USPS/ANM-T1-42 read as follows:

USPS/ANM-T1-41. Please provide all survey responses (i.e., to questions 1-10 as well as any additional comments given) for each respondent to the Alliance of Nonprofit Mailers survey of nonprofit organizations. Include any responses received since 12/30/97 and not reported in ANM-T-1.

USPS/ANM-T1-42. Please provide the FY1996 regular rate and nonprofit Standard(A) volumes for all mailers sent surveys, indicating which mailers responded to the survey and which did not respond.

ANM objects to these questions to the extent that they seek information concerning the names and addresses of the specific organizations responding to the surveys or require the identification of specific mailers. In soliciting the survey responses, ANM pledged not to disclose the specific identities of the responding

mailers to the public generally, or to the Postal Service in particular. ANM made this commitment in response to concerns of potential survey respondents that identifying them to the Postal Service would expose them to retaliation. Requiring ANM to breach this commitment would chill the ability of ANM and other trade associations to obtain similar information from their members in the future.

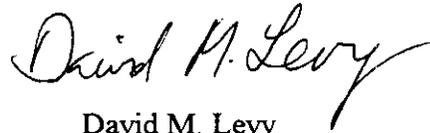
The Postal Service has no legitimate interest that warrants subjecting mailers and their trade associations to these risks. Dr. Haldi's testimony relied on the aggregate survey results to indicate the existence of a general problem, and "did not rely on the identity of any of the survey participants." *Cf.* Presiding Officer's Ruling No. MC95-1/19 at 6. As the ANM stated in its objections to interrogatories USPS/ANM-T1-26 and -36, which sought similar information about the same survey, ANM is willing to produce copies of the actual survey responses with the mailers' names, addresses and fax numbers, and similar identifying information redacted. This information will enable the Postal Service and other interested persons to verify whether the survey responses support the aggregate results claimed by Dr. Haldi. ANM is also willing to provide the first three digits of the ZIP Codes of the survey respondents. This information will allow the Postal Service and other interested persons to verify whether the mismatch between IOCS and RPW data is a localized vs. national problem.

More fundamentally, the best source of data on the extent of the IOCS/RPW mismatch for Standard Mail (A) mail entered by nonprofit organizations at commercial rates is the Postal Service itself. The Postal Service has, or should have, a mailing statement for every piece of mail entered by nonprofit mailers at commercial rates in the United States. Examining these statements, or a reasonable sample of

them, would provide independent confirmation of the significance of the IOCS/RPW mismatch.

Finally, ANM notes that these interrogatories appear to seek the same information sought by the Postal Service in Interrogatory USPS/ANM-T-1-26(a) and (b), to which the Alliance objected on February 6 and responded on February 10.

Respectfully submitted,



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February 20, 1998

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.

David M. Levy

February 20, 1998

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