

DOCKET SECTION

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

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POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

MOTION OF THE UNITED STATES POSTAL SERVICE TO COMPEL RESPONSES TO USPS/ANM-T1-41 and -42 (February 23, 1998)

On Friday, February 10, the United States Postal Service filed a motion for the Presiding Officer to compel the Alliance of Nonprofit Mailers to respond to discovery requests USPS/ANM-T1-26 and 36. On that day, the Alliance filed objections to two other interrogatories posed by the Postal Service: USPS/ANM-T1-41 and -42. These interrogatories 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.

As with its objections to USPS/ANM-T1-26 and -36, ANM's current objection alleges that revealing the names and addresses of the organizations responding to a survey conducted by the Alliance would subject these organizations to some sort of unspecified "retaliation" from the Postal Service. Further, the Alliance charges, as it did in its earlier objection, that the Postal Service has no legitimate interest in the information sought in its discovery requests that outweighs the imposition of the

unspecified concerns from which ANM wishes to protect its survey respondents.

Compare Objections of Alliance of Nonprofit Mailers to Interrogatories USPS/ANM-T1-26 and -36, February 6, 1998, at 2, to Objections of Alliance of Nonprofit Mailers to Interrogatories USPS/ANM-T1-41 and -42, February 20, 1998, at 1-2.

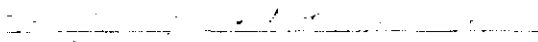
As ANM's arguments for withholding the information sought in ANM/USPS-T1-41 and -42 parallel its arguments for withholding the information sought in ANM/USPS-T1-26 and -36, the Postal Service hereby requests that interrogatories ANM/USPS-T1-41 and -42 be incorporated by reference into its Motion to Compel Responses to ANM/USPS-26 and -36, filed on Friday, February 20, 1998. By consolidating these motions, it is the hope of the Postal Service that ANM might respond to them at one time, and the Presiding Officer will, accordingly, have the opportunity rule on each of the objections simultaneously.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorney:


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February 23, 1998

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.


Anne B. Reynolds

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February 23, 1998