

# DOCKET SECTION

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, DC 20268-0001

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WASHINGTON, D.C. 20268-0001

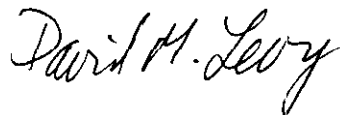
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Docket No. R97-1  
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Postal Rate And Fee Changes, 1997  
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## RESPONSE OF ALLIANCE OF NONPROFIT MAILERS WITNESS HALDI TO INTERROGATORIES USPS/ANM-T1-41-44

The Alliance of Nonprofit Mailers hereby provides the responses of its witness, John Haldi, to interrogatories USPS/ANM-T1-41 through -44. Each interrogatory is stated verbatim and is followed by a response.

Respectfully submitted,



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February 26, 1998

RESPONSE OF ALLIANCE OF NONPROFIT MAILERS WITNESS HALDI TO  
INTERROGATORIES OF THE UNITED STATES POSTAL SERVICE

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.

RESPONSE

Insofar as this interrogatory asks for the identity of or information that could lead to the identity of respondents to the ANM survey of nonprofit mailers, an objection has been filed. Insofar as it seeks other information, copies of the survey responses are being filed by ANM as Library Reference ANM-LR-1, with the identities of any respondents and any information that might lead to the identity of any respondent redacted. The responses provided include those received after December 30, 1997.

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USPS/ANM-T1-42: Please provide the FY 1996 regular rate and nonprofit Standard(A) volumes for all mailers sent surveys, indicating which mailers responded to the survey and which did not respond.

RESPONSE

ANM has previously objected to this interrogatory insofar as it asks for the identification of mailers who responded to survey. That includes those ANM members who did not respond, as the removal of those names from the list of ANM members would leave a list of those members who responded. Moreover, as ANM has previously indicated, it does not know all of the individual organizations to which the survey was sent. Finally, some but not all respondents to the survey indicated either or both of their regular rate and nonprofit rate Standard Mail (A) volumes. Those numbers, if provided, are shown on the individual survey responses being filed as Library Reference ANM-LR-1.

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USPS/ANM-T1-43. What efforts where made to ensure that all mailers responded to the survey, even if all their nonprofit mailings for FY 1996 were accepted at the nonprofit rate?

RESPONSE

Response to the survey was purely voluntary. Owing to the lack of time and resources, no provision was made to follow-up with organizations that did not respond. For a fully representative survey, one would need a random sample of the entire universe of mailers that entered mail at nonprofit rates in FY1996. Only the Postal Service has that information, and the Service neither undertook such a study in support of its rate request nor produced the information to ANM in response to its discovery requests.

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USPS/ANM-T1-44.

- (a) Are volumes reported in Exhibit ANM-T-1 for all of FY 1996, or do they represent one mailing for each respondent?
- (b) Did survey respondents indicate how many mailings were ruled ineligible for the nonprofit rate during FY 1996? If so, please provide the data reported, by mailer.

RESPONSE

(a) The Postal Service will have to draw its own conclusions from the answers provided on the individual responses. It appears to ANM that some responses clearly reflect more than one mailing or a direct mail campaign that was carried on over a number of days. ANM also assumes that many of the volumes reported represent more than one mailing and may, at least in some cases, reflect all of the respondent's mailings.

(b) The survey response forms submitted as ANM-LR-1 in response to USPS/ANM-T1-41 provide all information in the possession of ANM.

DECLARATION

I, John Haldi, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

John Haldi

Dated: February 26, 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 26, 1998