

DOCKET SECTION

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BEFORE THE
POSTAL RATE COMMISSION
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DOCKET SECTION
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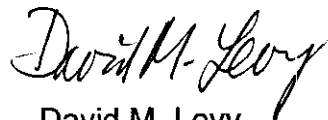
Docket No. R97-1

Postal Rate And Fee Changes, 1997

RESPONSE OF THE ALLIANCE OF NONPROFIT MAILERS TO INTERROGATORY USPS/ANM-35

The Alliance of Nonprofit Mailers hereby provides the following response to interrogatory USPS/ANM-35 submitted by the United States Postal Service. The interrogatory is stated verbatim and is followed by a response.

Respectfully submitted,



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February 26, 1998

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USPS/ANM-35. In response to USPS/ANM-1, the Alliance of Nonprofit Mailers provided a list of its members and indicated that members were not required to provide the types of information requested by the Postal Service as a condition of membership.

- (a) Does ANM know generally how its member's mailing are prepared and how that preparation has changed for each of the last ten years? If so explain fully.
- (b) Does the ANM have any general information about its members mailings which would indicate, by year, the changes in make-up such as changes in average bundle size, changes in containerization, and the average number of bundles and pieces per container? If so, please explain fully.
- (c) Does the ANM have any general information about its members' mailings which would indicate in percentage terms, what savings, if nay, ifs members have experienced in their mail preparation costs (excluding postage) due to changes in the make-up of their mailings. If so, please explain fully.
- (d) Even if a percentage cannot be calculated for such savings, as requested in subpart (c) above, please indicate whether or not ANM knows or believes that its members have experienced savings.

Response:

USPS/ANM-1 inquired about periodical mail. This interrogatory appears to inquire about all mailings by ANM members. However, the ANM does not require members to provide even general information about how members prepare their mail and the savings if any that its members realize from their mail preparation work. Therefore, the answers to the first three parts, part (a), (b) and (c) of USPS/ANM-35, with respect to both periodical mail and Nonprofit Standard Mail (A), are:

- (a) No.

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- (b) No.
- (c) No.
- (d) Following the filing of the request for changes in rates that initiated these proceedings, the ANM informally asked a number of its members as well as other nonprofit mailers and other representatives of nonprofit mailers if they were aware of any changes in the preparation or make-up of their mail that might explain the sudden, sharp and unprecedented increase in the cost of processing Nonprofit Standard Mail (A) Regular at a time when the costs of processing Standard Mail (A) Regular, the closest comparable subclass of mail, increased less than inflation. Those who responded unanimously stated that they were unaware of any changes in the preparation or make-up of their mail or the mail of other nonprofit organizations that would explain the sudden, sharp and unprecedented increase in processing costs or any reason that the costs of processing Nonprofit Standard Mail (A) Regular should have changed in any way different from the costs of processing Standard Mail (A) Regular. In fact, ANM devoted considerable time and effort attempting to identify any basis in the preparation of mail by nonprofit mailers or in the make-up of mail entered by nonprofit organizations at nonprofit rates that would explain the sudden, sharp and unprecedented increase in the costs of processing Nonprofit Standard Mail (A) Regular, but could not identify any.

Moreover, ANM is unaware of and does not believe that its members have experienced any savings in their mail preparation costs

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(excluding postage) due to changes in the make-up of their mailings. To the contrary, ANM believes that the mail preparation costs of its members and other nonprofit mailers has increased, not decreased, over the years, especially after the mail preparation requirements that resulted from MC95-1 went into effect. The savings, if any, result from the work-sharing discounts.

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.

A handwritten signature in cursive script, reading "David M. Levy", is written over a horizontal line.

February 26, 1998