

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

EXIGENT REQUEST, 2010

Docket No. R2010-4

**NATIONAL POSTAL POLICY COUNCIL RESPONSES TO
PRESIDING OFFICER'S INFORMATION REQUEST NO. 7**
(September 1, 2010)

The National Postal Policy Council hereby provides its responses to Questions 1 through 3 of Presiding Officer's Information Request No. 7, dated August 27, 2010. Each question is stated verbatim and is followed by the response.

Respectfully submitted,

National Postal Policy Council

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1. Please provide a copy of the questionnaire (or survey form) used to survey various NPPC mailer members.

RESPONSE:

There was no formal script for this survey. This began as an informal attempt to quantify the impact on NPPC members' First-Class Automation and Presort letter mail of the exigent rate increases proposed by the Postal Service on First-Class commercial Bulk letter rates. It was not a formal survey or an attempt to set baselines. It was prompted by the Postal Service's volume forecast, which NPPC believed might not accurately reflect the amount by which the rate increases would reduce First-Class Bulk letter volumes. The results of the survey were so striking that NPPC believed they should be shared with the Commission.

Each company's representative was asked in a telephone conversation approximately the following: "Now that you know the rates proposed by the Postal Service in the exigency case, can you tell me how much volume, if any, your company will withdraw from the mail in 2011 *solely because* (emphasis placed in each conversation) of that rate increase. This is volume above and beyond any you would have otherwise already been withdrawing for next year."

As necessary, further clarification was made during the discussion so that the responses provided would isolate the changes in the company's mail use due to the exigent rates from any changes in their mailing practices that were already

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planned. The members' responses were for calendar year 2011, not Postal year 2011.

Each company was assured that no company's individual numbers would be disclosed; any numbers presented would be in the aggregate.

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2. Please explain how the survey was conducted, and how many potential respondents were contacted.

RESPONSE:

The survey was conducted by telephone by NPPC Executive Director Arthur B. Sackler. The total number of companies contacted was 13. One company did not respond to the calls.

Only NPPC member companies were called. The companies called were among those NPPC members that are mail owners; mailing services companies were not called. A list of the NPPC's members is publicly available at <http://www.postalcouncil.org/directory.html>.

The calls took place from July 30 to August 5, 2010. That means that the companies had approximately one month to evaluate the proposed exigent rate increases before the calls were made.

The number of companies called was limited by the time available to make them, and to conduct any follow-up calls when necessary (for example, when a company, as many did, had to consult internally to obtain an accurate response). For these reasons, no attempt was made to call additional companies.

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3. What is the most recent annual total First-Class Mail volume of the 12 respondents? Please identify the annual period represented by the response.

RESPONSE:

NPPC does not have this information, and did not ask for such information as part of this survey.

Although NPPC believes, based on a previous internal survey, that its member companies include some of the largest First-Class mailers in the nation, NPPC does not have current data on companies' overall mail volumes in First-Class or any other class of mail.

If the Commission nonetheless should wish us to conduct what would amount to a separate survey, NPPC would, of course, make the attempt. Given vacation schedules, we would expect that gathering such information would take at least two weeks..

Certificate of Service

I hereby certify that I have this 1st day of September, 2010, caused to be served the foregoing document in accordance with sections 12 and 20(c) of the rules of practice.

William B. Baker
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