

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

RATE ADJUSTMENT DUE TO )  
EXTRAORDINARY OR EXCEPTIONAL ) Docket No. R2013-11  
CIRCUMSTANCES )

**MOTION OF  
MPA—THE ASSOCIATION OF MAGAZINE MEDIA  
AND ALLIANCE OF NONPROFIT MAILERS  
FOR ISSUANCE OF FOLLOW-UP INFORMATION REQUEST  
(October 2, 2014)**

Pursuant to 39 C.F.R. § 3001.21(a), the undersigned parties respectfully request that the Presiding Officer issue an Information Request to obtain answers to the questions stated in this motion. This request is a follow-up to the Postal Service's September 26 response to Presiding Officer's Information Request ("POIR") No. 15, which asked the Postal Service to provide data on the total number of Forever Stamps sold by month from September 2011 to August 2014. The Postal Service did not provide the requested information, however, but merely provided the data on total monthly Forever Stamp sales in dollars.

The Postal Service's stated rationale for not providing the requested volume information was that "the Postal Service's systems generally focus on revenue associated with stamp categories, rather than the number of stamps." USPS Response to POIR No. 15 at 2. This excuse is not credible. The Postal Service, whatever the "focus" of its "systems," clearly can estimate the number of Forever Stamps sold. We know this because the Postal Service estimated the number of

Forever Stamps in the hands of the public at the point when the exigent rates went into effect as part of its Postage in the Hands of the Public (“PIHOP”) adjustment to exigent surcharge revenue. The general method used by the Postal Service to accomplish this was detailed in POIR.13.Q.1.PIHOP.xls (filed in response to POIR No. 13 on June 6, 2014). In essence, the Postal Service simply divided Forever Stamp sales (in dollars) by the price of a stamp when the Forever Stamp was purchased. The same method can and should be used to provide a responsive answer to POIR No. 15.

Accordingly, the undersigned parties request that the Commission direct the Postal Service to estimate the number of Forever Stamps sold by month from September 2011 to August 2014, per POIR No. 15, using the same general approach as used in POIR.13.Q.1.PIHOP.xls (“the POIR 13 approach”). Additionally, the Commission should direct the Postal Service to estimate quarterly Forever Stamp exigent revenue by simply multiplying the number of 49-cent Forever Stamps sold during the quarter (derived using the POIR 13 approach) by two cents per piece.

In addition to using this approach prospectively, the Commission should also direct the Postal Service to making conforming revisions to the previously submitted quarterly reports for the second and third quarters of Fiscal Year 2014. See Notice of the United States Postal Service of Filing Revenue Collection Report for Quarter 3 of Fiscal Year 2014 (Filed August 15, 2014) and Response of the United States Postal Service to Order No. 2075 (Filed May 15, 2014).

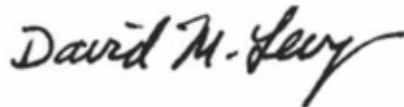
Finally, to promote transparency, the Commission should also direct the Postal Service to provide a quarterly comparison of (a) the number of Forever Stamps sold at 49 cents (using the POIR 13 approach); and (b) the Forever Stamp volumes included in

First-Class Mail billing determinants for the period in which the exigent surcharge was in effect (e.g., for FY 2014, Q2, the comparison should be based upon the period from January 26, 2014 to March 31, 2014).

### **CONCLUSION**

Wherefore, the undersigned parties respectfully request that the Presiding Officer issue an Information Request to obtain the information identified in this motion.

Respectfully submitted,

A handwritten signature in black ink that reads "David M. Levy". The signature is written in a cursive, flowing style.

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*Counsel for MPA—The Association of Magazine Media  
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