

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

NOTICE OF MARKET-DOMINANT
PRICE ADJUSTMENT

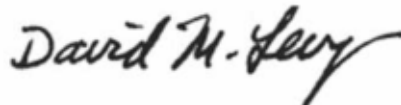
)
)

Docket No. R2015-4

**MOTION OF ALLIANCE OF NONPROFIT MAILERS
FOR ISSUANCE OF CHAIRMAN'S INFORMATION REQUEST**

Pursuant to 39 C.F.R. § 3001.21(a), the Alliance of Nonprofit Mailers ("ANM") respectfully requests that the Presiding Officer issue an Information Request to obtain answers to the questions stated in this motion. The proposed questions seek information on several apparent anomalies in the prices proposed by the Postal Service for Nonprofit Standard Mail.

Respectfully submitted,



David M. Levy
VENABLE LLP
575 7th Street, N.W.
Washington DC 20004
(202) 344-4732
dlevy@venable.com

Counsel for the Alliance of Nonprofit Mailers

January 28, 2015

PROPOSED QUESTIONS

1. 39 U.S.C. § 3626(a)(6)(B) requires that rates for Nonprofit Standard Mail “shall be established” so that the “estimated average revenue per piece to be received by the Postal Service from each subclass of [Nonprofit Standard Mail] shall be equal, as nearly as practicable, to 60 percent of the estimated average revenue per piece to be received from the most closely corresponding regular-rate subclass of mail.” The rates proposed by the Postal Service in this case, however, are calculated to generate average revenue per piece equal to 60.4 percent of the commercial average revenue per piece. Notice of Price Adjustment (Jan. 15, 2015) at 40.
 - a. How much additional revenue does the Postal Service project the rates for Nonprofit Standard Mail will generate compared with rates designed to achieve a revenue-per-piece ratio of exactly 60 percent?
 - b. Did the Postal Service consider any alternative set of Nonprofit Standard Mail rates that would have achieved a revenue-per-piece ratio closer to 60 percent than the rates ultimately proposed in this case? If your answer is anything but an unqualified negative, please identify each alternative set of rates that was considered, and state all of the reasons why the alternative set of rates was rejected.
2. The Postal Service has stated that its proposed price increases for Standard Mail as a whole will average slightly under two percent. For automation Nonprofit Standard Mail letters entered in Destination SCFs at the 5-digit level of presort,

however, the proposed increase (from \$0.099 to \$0.104) is approximately 5.1 percent.

- a. Did the Postal Service consider proposing any smaller increase in this rate?
 - b. If your answer is anything but an unqualified negative, please identify each alternative rate that was considered, and state all of the reasons why it was rejected.
3. Please refer to (Attachment B).xls, tab "Standard Mail Letters", and confirm that this attachment does not report dropship discounts for commercial or nonprofit Standard Mail Letters.
 4. Please refer to USPS-LR-R2015-4/2, CAPCALC-STD-R2015-4.xlsx, tab "L-F-P New Prices" and confirm:
 - a. For each presort level, the DNDC dropship discount (relative to origin) for commercial automation letters is 0.1 cents per piece larger than for nonprofit automation letters.
 - b. For each presort level, the DSCF dropship discount (relative to origin) for commercial automation letters is 0.2 cents per piece larger than for nonprofit automation letters.

- c. Holding all else constant, increasing dropship discounts for nonprofit automation letters would reduce the ratio of Standard Mail Nonprofit revenue per piece to Standard Mail Commercial revenue per piece.