

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

POSTAL RATE AND FEE CHANGES, 2006

DOCKET NO. R2006-1

REVISED RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OCA/USPS-27

The United States Postal Service hereby provides a revised response to interrogatory OCA/USPS-27, originally answered on July 24. The correction is to the last sentence of part (e), which appears to have been garbled in the original, although no substantive change is intended.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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July 28, 2006

REVISED RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-27. Please refer to USPS-T-38 at 6, n. 2. Witness Yeh states that: “the Postal Service intends to amend its regulations to require that Bound Printed Matter be paid either by customer generated postage meter or by permit imprint.”

- a. Does this mean that the Postal Service will deny consumers and small businesses the right to use adhesive stamps to pay for Bound Printed Matter (BPM) mail? Explain in full.
- b. Please confirm that §541 of the Domestic Mail Classification Schedule (DMCS) provides that: “Postage must be paid as set forth in section 3000.” If this is not confirmed, then explain in full.
- c. Please confirm that §3040 of the DMCS provides that: “All mail may be prepaid with postage meter indicia, adhesive stamps, permit imprint, or other payment methods specified by the Postal Service.” If this is not confirmed, then explain in full.
- d. Please confirm that denying stamp-using mailers of BPM the opportunity to pay postage by means of stamps is a violation of §3040. If this is not confirmed, then explain in full.
- e. Please refer to witness Yeh’s response to interrogatory DBP/USPS-T38-9 that “ancillary services such as, but not limited to, Certificate of Mailing, Delivery Confirmation, Signature Confirmation, Insurance, and COD” will be denied to retail customers of BPM. Confirm that such a denial violates §560 of the DMCS which explicitly allows BPM mailers the right to add these ancillary services to a BPM mailing. If this is not confirmed, then explain in full.

RESPONSE:

- a. Not confirmed. The change will require that ALL mailers use customer-generated postage meter, PC postage, or permit imprint to mail Bound Printed Matter. No mailers will be permitted to use postage stamps. No distinction is made as to the status of the customer. The permissible postage payment methods include methods that are available to consumers and small businesses.
- b. Confirmed.
- c. Confirmed.
- d. Not confirmed. DMCS § 3040 lists postage payment options. It cannot be read to require that all methods listed be available for all categories of mail. Doing so would be inconsistent with longstanding interpretation and accepted practice. Please see, for

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TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

example, DMM § 707.16.4, which states: “Postage for Periodicals may not be paid with permit imprint, meter stamp, postage stamp, or precanceled stamps.” Please see also DMM § 444.1.1, which does not allow the use of regular postage stamps for Standard Mail: “Postage for Standard Mail must be paid with meter (604.4.0), permit imprint (604.5.0), or precanceled stamps (604.3.0).”

e. Not confirmed. These services remain available to BPM mailers. It would be contrary to longstanding interpretation and accepted practice to interpret DMCS provisions regarding the general availability of services to foreclose the Postal Service from setting standards for the preparation of mail and the manner, place, and time of its entry.