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Stephen L. Scharfman
General Counsel
Postal Rate Commission
www.prc.gov

Re: Docket No. RM2003-1; Order No. 1355; Postal Rate Commission;
Additional Filing Requirements; 67 Federal Register 79538,
December 30, 2002

Dear Mr. Scharfman:

The American Bankers Association ("ABA") and the National Association of Presort Mailers ("NAPM") appreciate the opportunity to submit reply comments on the Postal Rate Commission's proposed rule designed to require the Postal Service to file additional testimony and evidence in rate and complex classification cases. ABA brings together all categories of banking institutions to best represent the interests of this rapidly changing industry. Its membership--which includes community, regional, and money center banks and holding companies, as well as savings associations, trust companies and savings banks--makes ABA the largest banking trade association in the country. NAPM represents presort mailers, the majority of whom are presort service bureaus, on issues and policies of the United States Postal Service which affect their businesses. Presort service bureaus are unique in that they provide the means for small business mailers to participate in the Postal Service's presort programs.

As stated in their initial comments, ABA and NAPM strongly support the proposal of the Postal Rate Commission to amend its Rules of Practice as set forth in the proposed rule and they offer these responses to the comments submitted by other parties. ABA and NAPM concur with the OCA comment, at section II. A. at page 4, that "A witness rather than an institution must respond to interrogatories seeking clarification of a proponent's position." This is necessary to ensure the ability of parties to conduct effective cross-examination on the issues involved.

In section II. C. 1 at page 10 of its comments, OCA requests that the Commission require the Postal Service to file quarterly and annual EXFC reports. ABA and NAPM agree with OCA that this change would be useful, but it does not go far enough. The Postal Service should be

required to develop and file reports that provide an accurate picture of the “reliability” and “speed of delivery” of workshared First-Class Mail. With the implementation of the Confirm system, the Postal Service has data available which would enable it to measure and report on its performance in processing and delivering this critical part of the mail stream.

In conclusion, ABA and NAPM encourage the Commission to establish rules requiring the Postal Service to file additional testimony set out in the proposed rules and these comments.

Sincerely,

Irving D. Warden
Associate General Counsel
American Bankers Association

Joel T. Thomas
Executive Director
National Association of Presort
Mailers