

**UNITED STATES OF AMERICA
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-00001**

**Proposed Rulemaking Concerning
Reporting Requirements for
Nonpostal Services**

Docket No. RM2004-2

COMMENTS OF PITNEY BOWES INC.

Pitney Bowes Inc. respectfully submits these comments pursuant to Order 1394, which invites comments on the Commission's proposal to amend its Rules of Practice and Procedure, 39 C.F.R. § 3001.1 *et seq.*, to establish certain reporting requirements for the Postal Service's non-jurisdictional activities. Pitney Bowes previously submitted comments pursuant to Orders 1353, 1364, and 1391 (incorporated herein by reference) in connection with the petition filed by Consumer Action and the Office of the Consumer Advocate requesting Commission review of certain enumerated unclassified services. That petition has led to the current rulemaking.

Pitney Bowes has long advocated that the Postal Service should focus on its core mission by working continuously to improve its established role of accepting, collecting, sorting, transporting, and delivering physical mail and packages. The Commission must account for the practical reality that the Postal Service is providing commercial, nonpostal services. Therefore, independent regulatory oversight is essential to ensure that the Postal Service, as a U.S. Government entity with a statutorily defined monopoly and service obligation, does not

improperly leverage its monopoly position to compete unfairly against the private sector for competitive services, and does not harm rate payers through its nonpostal activities.

The Commission's proposed rule establishing reporting requirements for nonpostal services will help address concerns regarding the need to guard against the possibility that jurisdictional services are used to subsidize non-jurisdictional services. The Commission's proposed rule also provides enhanced transparency and accountability with respect to nonpostal services consistent with the recommendations of the President's Commission on the United States Postal Service.¹

Accordingly, Pitney Bowes encourages the Commission adopt the proposed rule establishing enhanced reporting requirements for nonpostal activities.

Respectfully Submitted,

_____/s/_____
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April 15, 2004

¹ See Final Report of the President's Commission on the United States Postal Service, July 31, 2003, at 66.