

DOCKET SECTION

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

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POSTAL RATE AND FEE CHANGES, 1997 )  
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Docket No. R97-1

AMERICAN BANKERS ASSOCIATION  
INITIAL BRIEF

April 1, 1998

ABA, Edison Electric Institute (EEI), and the National Association of Presort Mailers (NAPM) have jointly sponsored testimony by witness Clifton dealing with rates for workshared First-Class Letter Mail (FCLM). ABA/EEI/NAPM submitted a Joint Initial Brief covering the issues dealt with in that testimony.

ABA and the Newspaper Association of America (NAA) submitted testimony by Dr. James A. Clifton dealing with rates for the second and third ounces of First-Class Mail. NAA is submitting its own Initial Brief. ABA's position on this issue is that, under the Postal Service's proposed rates, the extra ounce rate for the second and third ounces of workshared FCLM is too high and that, as recommended by Dr. Clifton, this rate should be reduced to 12 cents.

Dr. Clifton's testimony, ABA/NAA-T-1, demonstrates that neither the proposed extra-ounce rate for FCLM nor the absence of an extra-ounce rate for the second and third ounces of Standard A is cost justified and that his proposal to reduce the FCLM extra-ounce rate and slightly increase the cost coverage of Standard A

mail is both efficient and equitable.

ABA has also jointly submitted a brief with several other parties which addresses the Postal Service's Prepaid Reply Mail proposal.

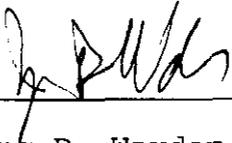
In summary, ABA's position in this case is that the rates recommended by Dr. Clifton are supported by rational analysis of the evidence in this case and by application of the relevant statutory factors.

Respectfully submitted,

  
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Irving D. Warden

CERTIFICATE OF SERVICE

I hereby certify that I have this date caused the foregoing document to be served upon all participants of record in this proceeding in accordance with Section 12 of the Rules of Practice.

  
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Irving D. Warden

1120 Connecticut Avenue, N.W.  
Washington, D.C. 20036  
(202) 663-5027 - phone  
(202) 828-4548 - fax  
April 1, 1998