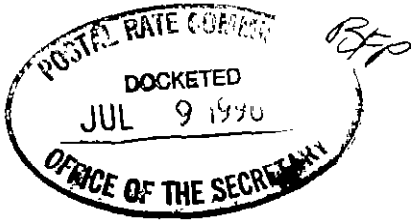


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BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

JUL 9 4 53 PM '96
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

SPECIAL SERVICES REFORM, 1996

Docket No. MC96-3

COMMENTS OF THE UNITED STATES POSTAL SERVICE CONCERNING THE
PROPOSED SPECIAL RULES OF PRACTICE
(July 9, 1996)

By Order No. 1115, dated June 12, 1996, the Commission invited comments on its Special Rules of Practice proposed for this Docket. The Postal Service hereby offers its comments on proposed Rules 3(B) and 3(C).

Rule 3(B). Rule 3(B) establishes alternative methods for filing and service of machine-readable documents, including filing of diskettes containing machine-readable versions of documents and service by e-mail via the Commission's server.

The Postal Service is cognizant of the Commission's interest in improving information exchanges, developing internet access to Commission dockets, and reducing duplicative tasks through adoption of electronic filing rules. Indeed, the Postal Service has been and continues to be willing to assist the Commission in meeting these objectives by providing many of its significant filings in machine-readable format.

The Postal Service finds, however, that preparation of machine-readable versions of documents, as well as electronic service of documents, on a routine basis, impose hardships, particularly on its professional and limited support staff, which often are charged with responsibility to retrieve, save, prepare, and transmit machine-readable documents. In addition, due to the presence of viruses, computer failures, and other causes, electronic messaging and e-mail file management have from time to time

failed or produced uncertain results. The Postal Service suspects, moreover, that the net benefit of making every document available in machine-readable format is dubious.

At this time, the Postal Service prefers hardcopy service and will continue to file and serve, and prefers that participants serve upon it, documents in accordance with Rules 9-12 of the Commission's Rules of Practice and Procedure. As a convenience to the Commission, however, the Postal Service will, whenever practical and possible, make a concerted effort to provide the Docket Section with machine-readable copies of significant documents, such as requests (including written testimony), proposed classification and rate schedules, initial and reply briefs, and comments responding to Commission Notices of Inquiry. In light of the problems and limitations discussed above, the Postal Service's ability to cooperate in this regard will be enhanced if demands for machine-readable versions are limited to those documents whose length and importance warrant this treatment.

Rule 3(C). Special Rule of Practice 3(C) provides that participants may serve discovery requests and objections and answers thereto upon the Commission, the Office of Consumer Advocate, the complementary party, and "any other participant so requesting, as provided in rules 25-27." The Postal Service proposes that Rule 3(C) be clarified to be consistent with the Commission's Rules of Practice and Procedure, which provide that all such documents are to be served upon the Postal Service. 39 C.F.R. §§ 3001.25-.27 All matters raised in Commission proceedings are of vital interest to the Postal Service, regardless of whether the Postal Service is a party to the discovery matter at issue. Additionally, assuming that the Commission carries these special rules forward from one proceeding to the next, it would be sensible to amend the rule so as to eliminate the need for the Postal Service to file a request for

- 3 -

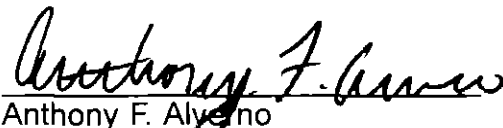
service of these documents in every docket.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

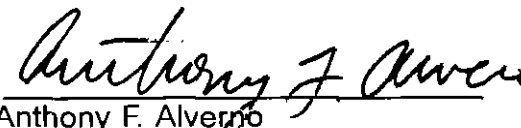
Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


Anthony F. Alverno

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
July 9, 1996


Anthony F. Alverno