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

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SPECIAL SERVICES REFORM, 1996

Docket No. MC96-3

COMMENTS OF UNITED STATES POSTAL SERVICE IN
RESPONSE TO COMMISSION NOTICE OF INQUIRY NO. 1

POSTAL RATE COMMISSION
DOCKETED
DEC 3 1996
OFFICE OF THE SECRETARY

On November 14, 1996, the Commission Issued Notice of Inquiry No. 1 Regarding Potential Improvements in the Organization and Structure of DMCS Provisions Related to Various Special Services (hereinafter "Notice"). The Notice invites participants in this docket to comment by December 3, 1996, on "broader improvements in the organization, format, and editorial presentation of the underlying DMCS, similar to those considered in the previous reclassification cases." Notice at 1. The Commission advises that it intends to publish a notice, presumably in the *Federal Register*, with proposed editorial revisions, including reorganization of the numbering system for the special services classification schedules and editorial revisions to the Domestic Mail Classification Schedule (DMCS).

As a general matter, the Postal Service shares the Commission's interest in improving the clarity, consistency, diction, and ease of use of the DMCS. The Postal Service is encouraged by the Commission's initiative in this regard, and the suggestions for improvement raised in the Notice have been well received. While the Postal Service does not, through these comments, intend to speak on behalf of the Governors or the Board, it is prepared to offer management's evaluation of the Commission's discussion points and the recommended procedures for addressing them.

Having given due consideration to specific matters raised in the Notice, the

Postal Service responds to the specific discussion points raised in the Notice as follows.

I. Numbering System for the Special Services Classifications

The Commission invites comments on the adoption of a new numbering system for the special services classifications that more closely resembles that used for other mail classifications. Attachment A to the Notice contains an illustration wherein the title heading "Special Services" is followed by a three-digit numbering system for each special service classification, beginning with section 701 and ending with section 720, with sections 700, 707, and 717 in brackets followed by the designation "Reserved." The order of the schedules for the special services follows that of the existing SS series.

The Postal Service agrees that renumbering the special service classifications and rate schedules would improve ease of use of the DMCS. The present numbering for the "SS" series is cumbersome and difficult to cite and cross-reference. Adoption of a three-digit numbering system would accordingly be a sensible alternative, as references to special services provisions would be easy to cite and otherwise communicate.

The Postal Service prefers that the three-digit numbers for special services commence at section 900, rather than with section 700. Use of a 900 series would establish a logical link with the Domestic Mail Manual (DMM), because in that publication, product descriptions for special services typically appear in the 900 series of the modules. See, e.g., DMM § D910, Post Office Box Service; DMM § S913, Insured Mail.

The Postal Service also believes that logic could be introduced to the sequence of special services. For instance, the services could be organized alphabetically to

improve ease of reference. An alternative to alphabetized sequencing could be to group classifications by the nature of the service,¹ although this would require that judgments be made about the nature of the services.

The use of reserved section numbers does not appear to be necessary. The use of reserved numbers would be of marginal value particularly if sequential logic is introduced to the special service classifications, because chance would dictate whether a new proposed service would fit logically in one of the reserved sections. Indeed, whether or not sequential logic is introduced, it would be preferable to begin the special service classifications with the number 900 and assign the next greatest multiple of five to each subsequent special service classification. This would most likely provide ample opportunity to preserve logical groupings or sequencing, or both, when new special services are proposed and implemented, without causing a wholesale renumbering of the special services classifications.

The Commission also seeks comments on replacing the heading "Classification Schedules" with "Special Services." The Postal Service is unaware of the existence of any such heading, because no heading appears between Classification Schedule SS-1 and its predecessor, DMCS § 484. See Order No. 1119 at pp. 75-76. Nonetheless, use of a heading would serve as a logical separator between the Standard Mail and special services schedules. The Postal Service prefers use of the term "Special Postal Services" for consistency with the 900 series of module S of the DMM. The Postal Service believes that the introduction of a heading preceding the special service classifications neither requires publication in the *Federal Register* nor requires any further evaluation by the participants.

¹ Examples would include grouping complements together, such as Certified Mail and Return Receipts, or grouping similar types of service together, such as Insured Mail and Express Mail Insurance.

II. Editorial Revisions and Changes

The Notice seeks comments on a variety of editorial revisions, which the Commission defines as changes that affect "basic presentation, content and clarity," and editorial changes, which include changes in "stylistic conventions, basic terminology, grammar and punctuation." Notice at 2 n.2.

The first two potential changes would introduce standard internal headings, such as "Restrictions on Availability," in the special services classifications, and would introduce consistency in the use of such headings. Presumably, these would function as subheadings within each special service product description and would apparently perform the same function as the headings in the Expedited, First-Class, Standard, and Periodicals sections. The assignment of a heading to a subsection requires that an evaluation be made of the primary purpose or theme of the section that it precedes. In some instances, deciding the theme, purpose, or overall idea of a section requires the exercise of judgment. Thus, while the Postal Service sees merit in introducing headings and subheadings, for reasons discussed in Part III, it would prefer to devote more study to these changes in a separate docket.

The third potential change would move the post office box fee schedule for facilities serving academic institutions, which now appears in section 10.031 of the main DMCS text, to the rate schedule section, with an appropriate cross-reference in the main text. The fourth potential change would revise the manner in which prorated fees for post office boxes in section 10.031 are expressed. The Postal Service supports these potential changes in concept. Because these changes are fairly straightforward, they could be addressed in the instant proceeding. The Postal Service would prefer that it be given the opportunity to express an opinion on a final, detailed version of these potential changes, through a vehicle such as a Presiding

Officer Information Request, as the Commission has done with respect to other DMCS changes, see Presiding Officer's Information Request No. 3, Question 18, Tr. 8/3101. The Postal Service does not believe publication of this potential change in the *Federal Register* is necessary.

The remaining changes set forth in Attachment B include correcting grammatical errors and inconsistencies in punctuation, improving the accuracy and appropriateness of references and stylistic conventions, revising terminology, eliminating superfluous language, standardizing presentation of various fee payments, and eliminating gender-specific terms.² Although the Postal Service agrees that these types of changes are worthwhile, it would prefer, for reasons discussed in Part III, to devote more study to these sorts of changes without being tied to the procedural deadlines of the instant proceeding.

III. Procedures

Except as otherwise noted above, the Postal Service favors deferral of the introduction of potential changes to the DMCS at this stage of the instant proceeding. There is little time left to consider these changes, because parties have moved to the final stage of rebuttal, and briefing is scheduled to be completed shortly thereafter. The Postal Service would, moreover, like the opportunity to give thorough consideration to a complete list of potential changes prepared by the Commission without being hastened by the procedural deadlines of this proceeding.

² Attachment B to the Notice questions whether the term "Second-class mail" should be replaced with the term "Periodicals" in schedule SS-1. The Postal Service is unable to locate the term "Second-class mail" in that schedule. If an outdated term such as "second-class mail" does appear elsewhere in the DMCS, however, an appropriate correction should be made in the recommended decision of this docket, and publication in the *Federal Register* of a proposal for this type of correction would appear to be unnecessary.

The Postal Service would especially welcome the opportunity to determine a logical sequence for the special service classifications and would like to explore the feasibility of conducting a wholesale review of the language, diction, and overall consistency of the DMCS. In this regard, the Postal Service notes that it has recently completed an editorial review of the DMM, and its experience with that publication could be applied to the DMCS.

The Notice requests that the Postal Service advise whether it anticipates filing a request for reclassification within the next six months of special or other services not included in this case. Notice at 3. The Postal Service presumes that the Commission's purpose in requesting this information is to ascertain whether the editorial changes discussed in Notice could be incorporated into such a reclassification case. Again, the Postal Service does not purport to speak for the Board, but the Commission has been told of the development of the Postal Service's work on other projects, Tr. 2/197, and it would not be unexpected for a filing to be made in the near future. Such a proceeding could include proposals for editorial changes such as those referenced in the Notice. Notwithstanding, the editorial and nonsubstantive matters raised in the Notice do not necessarily need to be piggybacked on any subsequent proceeding initiated by the filing of a Postal Service Request; they could also be the subject of a separate proceeding devoted to evaluating proposals for editorial improvements to the DMCS.

The Postal Service notes that both it and the Commission are authorized to initiate a classification case with proposals for editorial changes to the DMCS. 39 U.S.C. § 3623. The Postal Service favors a proceeding initiated by it, for in that circumstance the proposals would have the benefit of the Board's input. Should the Commission agree that a Postal Service initiated Request is preferred, the Postal

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Service would still appreciate receiving any other ideas from the Commission on improvements to the DMCS. If, however, the Commission determines to initiate a proceeding, the Postal Service would be more than willing to assist in enabling a productive outcome of any such docket.

Again, the Postal Service emphasizes its appreciation for the Commission's interest in improving the language and consistency of the DMCS, and looks forward to a productive and successful outcome.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

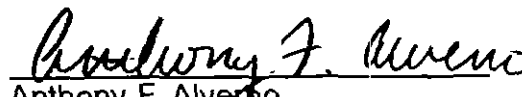
By its attorneys:

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.


Anthony F. Alverno

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2997; Fax -5402
December 3, 1996