## BEFORE THE POSTAL RATE COMMISSION WASHINGTON, DC 20268-0001

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POSTAL RATE COMMISSION OFFICE OF THE SECRETARY

	)	
EXPERIMENTAL "RIDE-ALONG"	)	
CLASSIFICATION CHANGE FOR PERIODICALS,	)	
1999	)	Docket No. MC00-1
	)	

## **COMMENTS BY MARIETTA CORPORATION IN SUPPORT OF SETTLEMENT**

Pursuant to paragraph 4(c) of the Stipulation and Agreement that was circulated recently to the participants by the United States Postal Service ("Postal Service"), Marietta Corporation ("Marietta") submits the following comments in favor of the negotiated settlement to this proceeding.

After making a thorough review of the discovery undertaken by the participants and the Office of Consumer Advocate ("OCA"), the testimony submitted by the Postal Service in support of the ride-along experiment and the various filings and submissions by the participants, Marietta endorses the negotiated settlement contemplated by the Stipulation and Agreement. Marietta believes that the ride-along will create additional revenue streams for the Postal Service as advertisers avail themselves of the opportunity to, among other things, insert actual product samples of a variety of items at a reduced (approximately ten cents per mailing piece) mailing rate versus Standard A. Indeed, Marietta has already received various inquiries from potential advertisers who are excited about the prospect of targeting focused audiences with their samples.

Notwithstanding the promise of the ride-along experiment, however, Marietta notes that issues remain concerning the Postal Service's implementation of the "uniform

thickness requirement" and "other preparation requirements" that are set forth in proposed section 443.1a of the Domestic Mail Manual. Marietta is hopeful that the Postal Service will implement rules that do not unduly restrict the scope of the ride-along experiment. Moreover, Marietta notes that there will still be a large discrepancy between rates charged advertisers whose inserts qualify for ride-along treatment and those who are approved for periodical rates. Contract packagers such as Marietta that are attempting to secure approval for proposed inserts at the periodical rate are often confused by the seemingly arbitrary standards under which the Postal Service reviews such applications. Consequently, they find themselves at a major disadvantage (approximately ten cents per mailing piece) versus their competitors. At the appropriate time, Marietta sincerely hopes that the Postal Service will clarify its standards for approving periodical-rate inserts such that additional contract packagers can avail themselves of a ratepricing opportunity that is now accorded to only one company.

Dated: December 17, 1999

Respectfully submitted,

Benjamin E. Rosenberg

David A. Schlesinger

Swidler Berlin Shereff Friedman, LLP

The Chrysler Building

405 Lexington Avenue, 12th Floor

New York, New York 10174

(212) 973-0111

Counsel for Marietta Corporation

## **CERTIFICATE OF SERVICE**

I hereby certify that I have on this date served all copies of this document in accordance with Section 12 of the PRC's Rules of Practice and Procedure.

Date: December 17, 1999

David A. Schlesinger