

WATCHTOWER

BIBLE AND TRACT SOCIETY OF NEW YORK, INC.

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LEGAL DEPARTMENT  
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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

FOB:FNT March 19, 2001

POSTAL RATE COMMISSION  
DOCKET SECTION  
1333 H STREET, NW, SUITE 300  
WASHINGTON, DC 20268-0001

DOCKET NO. R2000-1

Dear Mr. Gleiman:

WATCHTOWER SOCIETY RESPONSE TO ORDER NO. 1305  
REQUEST FOR FUTHER RECONSIDERATION

We appreciate the opportunity to provide comments on the three specific questions outlined in Order No. 1305.

- ***Can the commission lawfully recommend higher rates?*** At this time Watchtower is not prepared to make a comment on this question.
- ***Should the Commission recommend higher rates?*** We recommend that current rates remain unchanged until the next scheduled rate case and that the Postal Service revenue deficit be addressed at that time.
- ***How should higher rates be developed?*** If it is deemed that higher rates should be developed for R2001-1, we recommend additional revenue be obtained by focusing attention on rate categories that experienced a modest rate increase or a decrease with R2000-1. Two examples of this are:
  1. First-Class postage for the additional ounce was reduced by \$0.01.
  2. The letter-shaped nonprofit Standard mail basic rate was reduced by \$0.014.

We do not recommend that revenue be obtained from increases to letter-shaped Periodicals rates, which experienced an excessive increase with R2000-1. As a mailer of letter-shaped Periodicals publications, Watchtower experienced as much as a 23% increase in Periodicals postage costs as a result of the R2000-1 rate case. This increase was already excessive and not commensurate with the modest increases for First-Class or Standard letter-shaped mail.


Respectfully submitted,

Philip Brumley  
General Counsel  
100 Watchtower Drive  
Patterson, NY 12563-9204

CERTIFICATE OF SERVICE

I hereby certify that I have, this date, served the following document on all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

Respectfully submitted,

  
Philip Brumley  
General Counsel  
100 Watchtower Drive  
Patterson, NY 12563-9204

Date: March 19, 2001