

**BEFORE THE
POSTAL RATE COMMISSION**

RECEIVED
APR 10 3 03 PM '01
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

EXPERIMENTAL PRESORTED PRIORITY :
MAIL RATE CATEGORIES, 2001 :

DOCKET NO. MC2001-1

**DONNELLEY OPPOSITION TO UPS MOTION TO DENY
EXPERIMENTAL TREATMENT**

R.R. Donnelley & Sons Company ("Donnelley") submits this Pleading in opposition to the Motion of United Parcel Service to Deny Experimental Treatment for Proposed Presort Rates, filed on April 3, 2001 (UPS Motion). Although Donnelley has sought to participate in this proceeding only as a limited intervenor, the action sought by the UPS motion would so dramatically alter the nature of this proceeding that we are impelled to oppose it.

Donnelley made little or no use of the Priority Mail presort discounts adopted by the Commission in Docket No. R90-1 and extinguished in Docket No. R97-1. The added flexibility in the discount structure proposed in this proceeding has persuaded Donnelley that, if eligible to do so as a participant in the experiment, it would make fairly extensive use of the proposed Priority Mail presort rates.

If Donnelley does have the opportunity to participate in the experiment, it would surely not be true that the experiment would have the consequence of giving "rate relief [only] to certain large mailers." UPS Motion at 3. Although Donnelley does anticipate delivering significant quantities of Priority Mail to the Postal Service if it becomes a participant in the experiment, that mail would be delivered on behalf of both large and not so large mailers. Participation in the experiment by entities such as Donnelley would

guarantee that the benefits of the experimental rates will serve not just a handful of very large entities but a meaningful cross-section of the community of Priority Mailers.

From Donnelley's vantage, the proposal represents a thoughtful attempt by the Postal Service to gauge the costs and cost savings associated with the presortation of Priority Mail that deserves an opportunity to be tested. The experiment is truly that and should be given an opportunity for its results to be measured. The UPS motion should be denied.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "D. Volner", with a stylized flourish extending to the left.

Ian D. Volner
N. Frank Wiggins
Venable, Baetjer, Howard & Civiletti, LLP
1201 New York Avenue, Suite 1000
Washington, D.C. 20005-3917
idvolner@venable.com
nfwiggins@venable.com

Counsel to R.R. Donnelley & Sons Company

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.

William J. Olson, Esq.
John F. Callender, Jr., Esq.
John S. Miles, Esq.
William J. Olson, P.C.
Association of Priority Mail Users, Inc.
8180 Greensboro Drive, Suite 1070
McLean, VA 22102-3860

Dr. John Haldi
Haldi Associates, Inc.
488 Madison Avenue, Suite 1100
New York, NY 10022-5702

Douglas F. Carlson
P.O. Box 1077
Santa Cruz, CA 95061-1077

James Pierce Myers
Attorney at Law
1617 Courtland Road
Alexandria, VA 22306

James R. Cregan, Esq.
Executive Vice President
Magazine Publishers of America
1211 Connecticut Avenue, NW, Suite 610
Washington, DC 20036

Tonda Rush
King & Ballou
P.O. Box 50301
Arlington, VA 22205

Bruce R. Lerner
Bredhoff & Kaiser, P.L.L.C.
805 Fifteenth Street, NW
Suite 1000
Washington, DC 20005

Robert J. Brinkmann, Esq.
Vice President and Counsel, Postal and Regulatory Affairs
Newspaper Association of America
National Press Building
529 14th Street, NW
Suite 440
Washington, DC 20045-1402

William B. Baker
Wiley, Rein & Fielding
1776 K Street, NW
Washington, DC 20006-2304

Ted P. Gerarden
Director
Office of the Consumer Advocate
Postal Rate Commission
1333 H Street, NW, Suite 300
Washington, DC 20268-0001

Timothy J. May, Esq.
Patton Boggs, LLP
2550 M Street, NW
Washington, DC 20037-1350

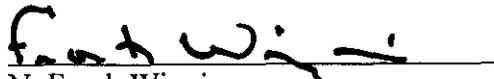
Timothy J. May, Esq.
Patton Boggs, LLP
2550 M Street, NW
Washington, DC 20037-1350

David B. Popkin
Post Office Box 528
Englewood, NJ 07631-0528

John E. McKeever, Esq.
Piper Marbury Rudnick & Wolfe L.L.P.
3400 Two Logan Square
18th and Arch Streets
Philadelphia, PA 19103-2762

Ron Swistock
United Parcel Service
Building 1, Floor 7
55 Glenlake Parkway, N.E.
Atlanta, GA 30328

Daniel J. Foucheaux
Chief Counsel, Ratemaking
United States Postal Service
475 L'Enfant Plaza West, S.W.
Room 6535
Washington, DC 20260-1137


N. Frank Wiggins

Dated: April 10, 2001