BEFORE THE POSTAL RATE COMMISSION

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POSTAL RATE COMMISSION OFFICE OF THE SECRETARY

IN THE MATTER OF POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

NOTE OF INTERVENTION AS A LIMITED PARTICIPATOR

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Pursuant to 39 CFR **i** 3001.20, Section(a) of the Commission's Rules of Practice, the National League of Postmasters of the United States ("LEAGUE") by its President, hereby petitions the Postal Rate Commission for leave to intervene as a limited participator in the above-entitled matter. William P. Brennan, President of the LEAGUE, (National League of Postmasters, 1023 North Royal Street, Alexandria, Virginia 22314), is authorized to receive service on behalf of petitioner of any documents relating to this proceeding.

In support of this petition, petitioner shows:

I.

Petitioner, the LEAGUE, established in 1897, is a non-profit professional management association of over 32,000 Postmasters, and postal and federal employees. П.

Petitioner has an interest in the proceedings of such nature that its intervention as a limited participator is necessary and appropriate to the administration of the Act, in that petitioner has been in the forefront of efforts to provide consistent, affordable, and predictable postal services to rural and urban areas of the nation. The members of the LEAGUE derive their livelihoods from employment with the Postal Service and provide postal services to millions of postal customers.

III.

Action taken by the Postal Service to change postal classifications and rates effect the working conditions of members of the LEAGUE and may adversely impact the services they offer to postal customers.

IV.

With respect to the changes in post office box fees for category D post offices proposed by the Postal Service, petitioner's position is that the proposed rates are excessive and will adversely impact the consistency, affordability and predictability of postal services to rural areas of the nation. The proposed post office box fees will force postal customers in rural areas to opt for general delivery or demand rural carrier service rather than maintain an overly expensive post office box. The cost to the Postal Service of providing general delivery is higher than the expense of maintaining post office box services to customers without any concomitant revenue increase. Substitution of rural delivery services to present post office box customers, would be more expensive to the Postal Service than post office box service if the proposed rate increase for post office boxes for category D offices is implemented. Further, neither general or rural delivery will provide the level of service to postal customers they presently receive from maintaining post office boxes. In summary, as the post office box rate increase for category D post offices will increase the cost of postal services to customers while providing lower net revenue to the Postal Service, all to the detriment of rural postal customers, Postmasters, and postal employees, the proposed increases for post office boxes in category D post offices is inappropriate, unnecessary and not in accord with applicable law and regulation.

WHEREFORE, for the foregoing reasons petitioner through its President, hereby prays that:

 the Commission grant an order permitting petitioner to intervene as a limited participator in the above-captioned matter, docket No. R97-1; 2. The Commission not approve the increase in post office box rates for category D post offices that is proposed by the Postal Service in this matter.

Respectfully submitted this 13th day of August, 1997.

William Bren

William P. Brennan, President National League of Postmasters 1023 North Royal Street Alexandria, VA 22314

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with 39 CFR § 3001.12, Section 12(a) of the Commission's Rules of Practice.

Date: <u>8-13-97</u> at national Leag. of PM

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Jerry Meyers