

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

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U.S. DEPT. OF JUSTICE  
OFFICE OF THE ATTORNEY GENERAL

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

**POSTCOM COMMENTS AND SUPPORT OF  
"MOTION OF THE UNITED STATES POSTAL SERVICE  
FOR THE ESTABLISHMENT OF A PROCEDURAL MECHANISM  
AND SCHEDULE GOVERNING FURTHER PROCEEDINGS  
IN LIGHT OF SETTLEMENT"**

The Association of Postal Commerce ("PostCom") supports the motion concerning procedures filed by the United States Postal Service on January 22, 2002.

The schedule proposed provides reasonable opportunity for the only necessary litigative steps, in this proceeding: the opportunity for APWU to present testimony on the basis for its unique opposition to the settlement of the case; and the rights of other litigants to examine and contest that position.

Most imperatively, the schedule proposed by the Postal Service will permit the Commission to issue a recommended decision by March 25, 2002. Although the Commission has commented that this date "is an apparent oversight"<sup>1</sup> the March 25 date, in fact, is very important. A number of PostCom members write and implement the software programs that are necessary to process mail. When there are changes in postal regulations, as will be the case in implementation of R2001-1, at least 90 days of lead-time is necessary to prepare and implement these programming changes and the process cannot begin until the final rates are known with a high degree of certainty. Thus, effectively, the start date for the work in software changes is the date in which the Commission issues its

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<sup>1</sup> Presiding officers Ruling Noticing the Submission of a Proposed Stipulation and Agreement and Canceling Hearings POR No. R2001-1/27, 4.

Recommended Decision. The June 30 implementation date of the rather significant, at least for some classes of mail, changes in classification and rates makes it necessary that the mailing community know by at least March 25 that the Commission has approved of the new rates and classification changes.

The Commission should adopt the Postal Services' proposed schedule for proceeding and it should also make every effort to announce its decision in this proceeding by not later than March 25 of this year.

Respectfully submitted,

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

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Counsel for Association for Postal Commerce

January 28, 2002

## CERTIFICATION

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.

*N. Frank Wiggins, per 10 v*

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January 28, 2002