

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0111

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEES CHANGES, 2001

Docket No. R2001-1

INITIAL BRIEF
of
MAIL ORDER ASSOCIATION OF AMERICA

David C. Todd / bmo

DAVID C. TODD
PATTON BOGGS LLP
2550 M Street, N.W.
WASHINGTON, D.C. 20037-1350
Tel: 202/457-6410
Fax: 202/457-6315
Email: dtodd@pattonboggs.com

Counsel for Mail Order Association
of America

Dated: March 4, 2002

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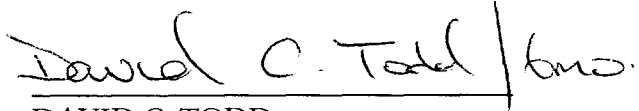
**INITIAL BRIEF
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MAIL ORDER ASSOCIATION OF AMERICA**

The Mail Order Association of America ("MOAA") is a signatory to the Stipulation and Agreement ("Settlement Agreement") submitted by the United States Postal Service in the above-captioned proceeding. MOAA's principal interest in this proceeding is the rates for Standard Mail Regular, Standard Mail ECR and Bound Printed Matter. The rates, fees and classifications contained in the Agreement for those and all other types of mail are supported by substantial evidence of record and MOAA urges that they be adopted, without modification, by the Recommended Decision of this Commission.

The overwhelming support of the Agreement by the parties to this proceeding, parties with frequently differing interests, argues strongly for its adoption. The Postal Service and the parties have shown a willingness to negotiate their differences and agree to changes to the proposal submitted originally by the Postal Service. It is important that this demonstration of good faith be recognized by the Commission's acceptance of the Agreement.

Finally, the expected financial difficulties that led the Chairman to convene settlement negotiations have been shown to be, if anything, more substantial than anticipated. The volume losses and deficits have been severe and the financial well-being of the Postal Service requires that the increased rates be made effective in accordance with the Agreement. Any modification of the Agreement would inevitably risk delay in implementation. Just as important, those parties who have heeded the call of this Commission to respond to an emergency situation should not be faced with rates other than those to which they have agreed.

Respectfully submitted,

A handwritten signature in black ink that reads "David C. Todd" followed by a vertical line and the letters "bmo".

DAVID C. TODD
PATTON BOGGS LLP
2550 M Street, N.W.
WASHINGTON, D.C. 20037-1350
Tel: 202/457-6410
Fax: 202/457-6315
Email: dtodd@pattonboggs.com

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CERTIFICATE OF SERVICE

I hereby certify that I have this date served (6) copies of the foregoing document upon the United States Postal Service by hand and by First Class Mail upon all participants in this proceeding requesting such service in accordance with rule 12 of the Rules of Practice.

Dated: March 4, 2002

A handwritten signature in black ink that reads "David C. Todd" followed by a vertical line and the letters "bmo".

David C. Todd