

PERIODICALS COALITION

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POSTAL RATE COMMISSION
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March 29, 2002

BY HAND

Mr. William T. Johnstone
Secretary of the Board of Governors
U.S. Postal Service
475 L'Enfant Plaza, SW
Washington DC 20260-1000

Re: Postal Rates and Fees, 2001
PRC Docket No. R2001-1

Dear Mr. Johnstone:

Pursuant to 39 C.F.R. § 9.2, the undersigned members of the Periodicals Coalition¹ hereby submit these comments regarding the March 22, 2002 Recommended Decision of the Postal Rate Commission in the above-referenced proceeding, in which the Periodicals Coalition and its members were active litigants.

The members of the Coalition commend the Postal Service and the Commission for their diligence and dedication during this unusual proceeding. We note the special contribution of Dan Foucheaux, Postal Service Chief Counsel, Ratemaking, who coordinated the complicated and extensive negotiations that led to the Settlement Agreement with exemplary skill, fairness and professionalism.

As signatories to the Settlement Agreement, we urge the Governors to approve the Recommended Decision of the Postal Rate Commission. Critical to our decision to join in the Settlement Agreement, and to the Commission's approval of the Agreement, were the understanding embodied in the Agreement that new rates will be implemented no earlier than June 30, 2002,² and the intention, expressed in the Postmaster General's letter of December 26, 2001, not to file another omnibus rate case before October 2002, at the earliest.³ We trust that these assurances will be honored.

¹ Alliance of Nonprofit Mailers; American Business Media; AOL Time Warner Inc.; Coalition of Religious Press Associations; Dow Jones & Co., Inc.; Magazine Publishers of America, Inc.; The McGraw-Hill Companies, Inc.; National Federation of Independent Publications; and National Newspaper Association.

² See *PRC Op. R2001-1* at 5, ¶ 1015 ("The Postal Service agrees not to implement the proposed rate, fee, and classification changes prior to June 30, 2002").

We thank you for the opportunity to present these comments to the Governors.

Respectfully submitted,

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³ See *PRC Op. R2001-1* at 45, ¶ 2076:

... signatories have the Postal Service's commitment to defer its next rate filing as long as practicable. Undoubtedly, this formed an important consideration in the participants' willingness to agree to the settlement. The Commission expects the Postal Service to carry through on its undertaking to take all necessary steps to defer its next omnibus rate request as long as practicable.

See also *id.* at 6, ¶ 1016 ("Although the length of the commitment is somewhat open-ended, it represents, in the Commission's view, an important facet of the settlement").

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CERTIFICATE OF SERVICE

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

Timothy L. Keegan
Timothy L. Keegan

March 29, 2002