

UNITED STATES OF AMERICA  
Before The  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

Experimental Changes to Implement )  
Capital One NSA )

Docket No. MC2002-2

OFFICE OF THE CONSUMER ADVOCATE NOTICE  
PROVIDING ACCESS TO COMMENTS FILED IN MC2002-2  
(November 1, 2002)

Given the interest demonstrated by the public in gaining access to comments filed under Commission Rule 20(b)<sup>1</sup> in the instant proceeding, the Office of the Consumer Advocate (OCA) has created imaged files of the comments and attached them to this notice. The comments of two companies – United Parcel Service (UPS) and FleetBoston Financial Corporation (FleetBoston) – were brought to the attention of participants at the prehearing conference held on October 23, 2002. Chairman Omas stated that:<sup>2</sup>

I am very aware that this case is viewed by some as a test of the acceptability of negotiated service agreements and the Commission should not rush to judgment without allowing all voices to be fully heard. As most of you know, the Commission's Rule 20(b) allows for those who choose not [to] formally intervene to advocate the Commission with their views. The commission has already received interesting comments under that provision from the United Parcel Service and Fleet Bank.

The comments alluded to were filed by UPS on October 16, 2002, and FleetBoston on October 17, 2002. The access to the comments provided in this notice

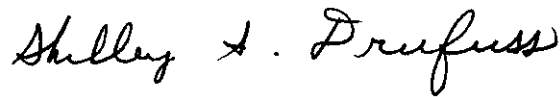
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<sup>1</sup> 39 C.F.R. §3001.20(b).

<sup>2</sup> Tr. 1/24.

is in no way an endorsement of the statements made by the commenters. OCA neither endorses nor opposes the views of the commenters. OCA's sole aim is to give convenient access to participants and the public, particularly those who live far from Washington, D.C.

Respectfully submitted,

A handwritten signature in black ink that reads "Shelley S. Dreifuss". The signature is written in a cursive style with a prominent initial 'S'.

Shelley S. Dreifuss  
Director  
Office of the Consumer Advocate

1333 H Street, N.W.  
Washington, D.C. 20268-0001  
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OCT 16 9 30 AM '02

OFFICE OF THE SECRETARY  
POSTAL RATE COMMISSION

October 16, 2002

Honorable Steven W. Williams  
Secretary, Postal Rate Commission  
Suite 300  
1333 H Street  
Washington, D.C. 20268-0001

Re: Docket No. MC2002-2; Informal Expression of Views On  
Service Changes to Implement Negotiated Service Agreement  
With Capital One Services, Inc.

Dear Secretary Williams:

Pursuant to Section 3001.20b of the Commission's Rules of Practice and Procedure, United Parcel Service ("UPS") hereby submits the following statement of views with respect to the above-referenced proceeding.

In that proceeding, the Postal Service has requested the Commission to grant experimental authority to implement a Negotiated Service Agreement it entered into with Capital One Services, Inc. UPS does not object to the granting of that experimental authority.

However, UPS does remain concerned about Negotiated Service Agreements in general, and their impact on the competitive marketplace in particular.

Respectfully,



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Kenneth Churchill  
Vice President, Public Affairs  
United Parcel Service  
316 Pennsylvania Ave. SE, Suite 300  
Washington D.C. 20003



*FleetBoston Financial*

RECEIVED

OCT 17 4 27 PM '02

OFFICE OF THE  
POSTAL RATE COMMISSION

October 17, 2002

***By Hand Delivery***

Steven W. Williams  
Secretary  
Postal Rate Commission  
1333 H Street, NW  
Suite 300  
Washington, D.C. 20268-0001

Re: Experimental Mail Classification Case  
Docket No. MC2002-2; Order No. 1346

Dear Mr. Williams:

FleetBoston Financial Corporation (“FleetBoston” or the “Corporation”) is pleased to offer the following comments to the Postal Rate Commission with respect to the above-referenced matter on behalf of itself, Fleet National Bank, its primary banking subsidiary and Fleet Bank (RI), National Association, its credit card banking subsidiary. FleetBoston is the seventh largest financial holding company in the United States as of September 30, 2002, based on total assets. FleetBoston’s principal businesses, Personal Financial Services and Wholesale Banking, offer a comprehensive array of innovative financial solutions to 20 million customers. Through its Personal Financial Services franchise, FleetBoston offers retail banking, wealth management and investment services, nationwide brokerage, credit card and consumer lending services. FleetBoston is a leader in small business services and commercial banking in the Northeast. FleetBoston’s Wholesale Banking division provides commercial lending, syndications, leasing, cash management, asset-based finance, foreign exchange and interest rate derivatives to corporate clients.

FleetBoston strongly supports the concept of Negotiated Service Agreements (“NSAs”) such as the one being considered for Capital One Services, Inc. (“Capital One”). We applaud the United States Postal Service (“USPS”) for looking at innovative ways to serve its customers.

FleetBoston is a significant customer of the USPS. The Corporation estimates that it will mail in excess of 500 million pieces in 2002. As a significant user of U.S. mail services, FleetBoston would also like to be considered for an NSA. Our concern about the proposed NSA with Capital One is that it will provide a competitive advantage for one company over others. In the interest of fairness, FleetBoston believes that if the

proposal with Capital One is approved, that similar arrangements with other high-volume mailers should also be approved in a timely fashion. More specifically, other high-volume mailers should be given the opportunity to proceed immediately with an NSA on the same or substantially the same terms as Capital One; alternatively, the USPS should be prepared to promptly negotiate similar arrangements with other interested high-volume mailers. We respectfully suggest that if the Postal Rate Commission approves the NSA with Capital One it delay the effective date for the proposal until others have had the chance to negotiate similar arrangements with the USPS.

FleetBoston strongly supports the efforts by the USPS to be flexible and to look at new ways to better serve its customers in a cost-effective manner.

The Corporation appreciates the opportunity to present its views on this important matter. If you have any questions concerning these comments, or if we can otherwise be of assistance in connection with this matter, please do not hesitate to contact me at (781) 467-2342.

Sincerely,

A handwritten signature in black ink that reads "Susan B. Shadle". The signature is written in a cursive, flowing style.

Susan B. Shadle  
Senior Relationship Manager  
Mail Services