

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

PETITION FOR REVIEW OF UNCLASSIFIED SERVICES

DOCKET No. 2003

COMMENTS OF POSTCOM

The Association for Postal Commerce (PostCom) offers these comments pursuant to the schedule established in the Commission's Order No. 1353.

PostCom takes no position on the first element of the Consumer Action petition concerning proceedings to test the Commission's jurisdiction over 14 listed services asserted by Consumer Action to be offered unlawfully by the Postal Service because the terms on which these services are offered should first have been the subjects of recommended decisions from the Commission.

The second leg of the petition is of interest to PostCom. PostCom shares the view that it is worth at least a hard look by the Commission to examine the feasibility of establishing accounting standards for services offered by the Postal Service outside of the Commission's rate recommending powers. This is not a revolutionary precept. Both the Federal Communications Commission (at 47 C.F.R. Part 32) and the Federal Energy Regulatory Commission (at 18 C.F.R. Part 101) have developed fairly elaborate accounting conventions for the entities regulated by those two agencies. In some measure, those accounting rules are designed to deal with precisely the issue presented here, proper accounting for services that fall outside of rate regulation. PostCom

submits that the Commission should initiate a rulemaking proceeding designed to examine various approaches to the establishment of accounting conventions that would be applied to offerings by the Postal Service that are not subject to regulated rates.

Respectfully submitted,

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January 30, 2003

CERTIFICATE OF SERVICE

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

Respectfully submitted,

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