

**UNITED STATES OF AMERICA
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001**

Petition for Review of Unclassified Services

Docket. No. *2003

COMMENTS OF PITNEY BOWES, INC.

Pitney Bowes, Inc., appreciates the opportunity to provide these comments pursuant to Order 1353 concerning how the Commission should proceed with the petition it has received from Consumer Action ("CA") and the Office of the Consumer Advocate ("OCA") for review of unclassified services.

Pitney Bowes is a leader in integrated mail, messaging, and document management solutions, and a major manufacturer and distributor of dedicated postal meters and computer-based metering technology. Pitney Bowes and its customers have a substantial interest in a viable and competitive Postal Service and in postage rates and mail classifications related to all classes of mail and particularly to First-Class Mail.

Pitney Bowes has consistently maintained that the Postal Service should focus on its core business and work to improve its traditional role of accepting, collecting, sorting, transporting, and delivering physical mail. Pitney Bowes has also expressed its position that special attention be given to the potential misuse of the USPS's regulatory authority, particularly its licensing power over private sector enterprises in markets where USPS attempts to compete with private parties either directly or by partnering with private firms. Pitney Bowes also considers it important that the Commission address any credible allegations that USPS is using ratepayer-generated revenue from core postal services to subsidize "non-postal" services in competition with private parties.

Pitney Bowes agrees that the allegations raised in the joint petition raise important issues. Neither Pitney Bowes nor any other party has yet had the opportunity,

however, to review the findings of the Postal Service's internal review.¹ Because the proceeding is predicated upon the Postal Service's response to the allegations raised in the petition, without the benefit of reviewing the findings of the Postal Service's internal review parties cannot provide meaningful comments on the most appropriate manner for the Commission to proceed.

Accordingly, Pitney Bowes respectfully requests that the Commission afford all interested parties the opportunity to comment on the appropriate scope and manner of the proceeding after having the opportunity to consider the results of the Postal Service's internal review.

Respectfully submitted,

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January 30, 2003

¹ The Letter to the Honorable George A. Omas from the Honorable Robert F. Rider, Chairman of the Board of Governors, November 14, 2002, at 2, states that this review was expected to be completed in early January. Pitney Bowes understands that its results will not be made public, or discussed in any manner, until the Postal Service files its comments in this proceeding.