

**BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001**

**CUSTOMIZED MARKET MAIL
MINOR CLASSIFICATION CHANGES**

Docket No. MC2003-1

**AMERICAN POSTAL WORKERS UNION, AFL-CIO
Comments on OCA Motions**

(April 10, 2003)

The American Postal Workers Union, AFL-CIO ("APWU") opposes the Office of Consumer Advocate motions to Deny Application of Minor Classification Rules and Suspend Proceedings. Implicit in the OCA effort is the conclusion that the proposed classification changes to implement Customized Market Mail are not minor. The OCA assumes that CMM may result in sufficient volume such that the Commission must concern itself with possible substitution and exacerbation of the problem with an under-priced residual shape surcharge – and the current record is consequently insufficient to address such concerns.

The Postal Service can either respond quickly to the concerns raised by the OCA or not at all. If the Postal Service must conduct studies and produce data suggested in the OCA interrogatories, then CMM is not a minor matter and the Postal Service will likely abandon this request as the studies and production of data will cost more than the classification changes are worth. There may be additional evidence –not currently in the record – that will satisfy the OCA and that the Service can produce quickly. In any event delay will not result in an improved evidentiary record.

As this case proceeds should the Postal Service or the Commission decide to treat the requested classification changes as something short of permanent changes, it should not require either a delay or a new start.

Respectfully submitted,

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CERTIFICATION

I hereby certify that I have this date served the foregoing document in accordance with the rules of practice

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