

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

Rules applicable to Baseline)
and Functionally Equivalent)
Negotiated Service Agreements)

Docket No. RM 2003-5

Response of Discover Financial Services, Inc. to
OCA's Motion to file Supplemental Comments
October 14, 2003

On October 10, OCA moved to file supplemental comments in this docket on the issue of NSAs versus pilot tests. Discover hereby responds to that motion.

Discover does not oppose the Commission allowing OCA to file its supplemental comments in this docket. Indeed, the OCA has raised a very interesting point. However, Discover strongly objects to any delay in the initial issuance of the Commission's NSA rules, especially since any delay could cause significant competitive disadvantage to the competitors of parties that are already receiving the benefits of an NSA.

On page one of the August 27th Notice opening this Docket, the Commission said it anticipates a series of rulemakings in this Docket designed to facilitate consideration of NSAs. The issues raised by the OCA in its Supplemental Comments could be the subject of one of these subsequent rulemakings.

Consequently, Discover urges the Commission to defer consideration of the issues raised by the OCA until after it issues a final version of the NSA rules proposed in its August 27th Notice and Order establishing Docket RM 2003-5.

Respectfully submitted,

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