

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

RATE AND SERVICES CHANGES TO  
IMPLEMENT FUNCTIONALLY EQUIVALENT  
NEGOTIATED SERVICE AGREEMENT WITH  
DISCOVER FINANCIAL SERVICES, INC.

Docket No. MC2004-4

REQUEST OF THE UNITED STATES POSTAL SERVICE FOR  
ESTABLISHMENT OF SETTLEMENT PROCEDURES  
(June 21, 2004)

The United States Postal Service hereby requests that the Commission establish settlement procedures for this filing. Pursuant to chapter 36 of title 39, United States Code, the United States Postal Service has determined that it would be in the public interest, and in accordance with the policies and applicable criteria of that title, to implement the classifications, rates and fees contained in the Negotiated Service Agreement (NSA) with Discover Financial Services, Inc. (DFS), which is attached to the request in this case.

The Postal Service believes that there is a distinct possibility of settlement in this case as the agreement is likely to be found functionally equivalent to the Capital One NSA. Therefore, the Postal Service requests that a settlement conference be scheduled immediately following the deadline for intervention. Reaching a settlement promptly will obviate most, if not all, subsequent procedural steps.

The likely functional equivalence of the Discover Financial Services NSA should result in an expeditious and uncomplicated review. Therefore, the Postal

Service requests the Commission's assistance in establishing settlement procedures for this proceeding.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

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Brian Reimer

## **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.

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Brian Reimer

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