

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

Postal Rate Commission  
Submitted 5/12/2005 3:39 pm  
Filing ID: 44113  
Accepted 5/12/2005

POSTAL RATE AND FEE CHANGES, 2005 )

Docket No. R2005-1

ADDITIONAL COMMENTS OF AMERICAN BANKERS ASSOCIATION AND  
NATIONAL ASSOCIATION OF PRESORT MAILERS  
UPON PROCEDURAL SCHEDULE  
(May 12, 2005)

At the May 5, 2005 Pre-Hearing Conference in this proceeding, Chairman Omas gave all parties until May 12, 2005 to file additional comments concerning an appropriate cut-off date for discovery upon the Postal Service, and identifying any particular areas of the Postal Service case for which substantial time was needed for discovery.

In response to a question from the Chairman at the Pre-Hearing Conference, NAPM counsel, Mr. Hart, stated that he felt that June 15 would be an appropriate cut-off date for discovery upon the Postal Service. Having now had the opportunity to discuss the matter in more detail with our expert witness, ABA and NAPM suggest Friday, June 17, 2005 as an appropriate date for cut-off of discovery against the USPS. Setting the cut-off date at the last workday of the week will allow the parties to conduct discovery for the entire work week of June 13-17, 2005. We also note that shortening the discovery period may not advance a settlement.

ABA and NAPM remain interested in and hopeful for a settlement of this case. However, we need to protect ourselves against the possibility that the case does not settle; and for this reason we need to conduct discovery of the Postal Service. Furthermore, in assessing whether to enter into a Settlement Agreement, ABA and NAPM need to evaluate the Postal Service case filed herein in order to assure ourselves that the rates included in any settlement are supported by the record. In particular, we need to better understand the mail processing cost models, the measures of cost avoidance, the changes in delivery cost measures, and the economic forecasts utilized by the Postal Service in its case.

Respectfully submitted,

AMERICAN BANKERS ASSOCIATION  
NATIONAL ASSOCIATION OF PRESORT MAILERS

---

Henry A. Hart, Esq.  
Reed Smith LLP  
1301 K Street N.W.  
Suite 1100 - East Tower  
Washington, DC 20005  
Ph: 202-414-9225  
Fax: 202-414-9299  
Counsel for National Association  
of Presort Mailers

Irving D. Warden  
Assoc. General Counsel  
American Bankers Association  
1120 Connecticut Ave., NW  
Washington, DC 20036  
Ph: 202-663-5027  
Fax: 202-828-4548  
Counsel for American Bankers  
Association

May 12, 2005  
Washington, D.C.