

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

RATE AND SERVICE CHANGES TO IMPLEMENT
BASELINE NEGOTIATED SERVICE AGREEMENT
WITH WASHINGTON MUTUAL BANK

Docket No. MC2006-3

MOTION OF THE UNITED STATES POSTAL SERVICE
FOR ESTABLISHMENT OF SETTLEMENT PROCEDURES
(March 29, 2006)

The United States Postal Service hereby moves 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 Washington Mutual Bank (WMB).

The Postal Service submits that there is a distinct possibility of settlement in this case. The relatively straightforward nature of the WMB NSA should result in an expeditious and uncomplicated review. Even though it is a new baseline agreement, the substance of the agreement concerns the availability of declining block rates, which are now a well-established feature of NSAs.

Moreover, the agreement is extremely straightforward, and the new features of the agreement consist of risk mitigation safeguards. Thus, the Postal Service submits that the issues arising from this filing and should not be particularly contentious.

Naturally, there is room for disagreement over details, and the extent of any such diverging views can be determined in the course of settlement discussions. Such discussions could facilitate limitation of the issues that need to be litigated, which will aid the Commission in expediting the proceedings, as its Rules require.

For these reasons, the Postal Service moves for the establishment of settlement procedures for this proceeding and suggests that a settlement conference be scheduled immediately following the deadline for intervention.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Anthony F. Alverno
Chief Counsel, Customer Programs

William J. Trumpbour

Sheela A. Portonovo

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1135
(202) 268-3928, Fax -5418
March 29, 2006