

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

CLASSIFICATION CHANGES TO CLARIFY
EXPRESS MAIL SECOND DAY SERVICE

Docket No. MC2006-4

INITIAL COMMENTS OF UNITED STATES POSTAL SERVICE
(May 3, 2006)

The United States Postal Service hereby submits its initial comments on the Postal Rate Commission's proposed change to DMCS § 123.1, set forth in Order No. 1462, Notice and Order Instituting Docket No. MC2006-4 for Classification Changes to Clarify Express Mail Second Day Service (April 18, 2006). Specifically, the Commission proposes to change a sentence that currently reads:

Second Day Service is available for second day delivery
to read:

Second Day Service is available for delivery on the second delivery day as specified by the Postal Service.

Order No. 1462 at 2-3.

The Postal Service believes that any changes to DMCS § 123.1 should reflect the Express Mail guarantee as accurately as possible. The wording of the proposed change would not accomplish that objective because the guaranteed date of delivery for Second Day Express Mail will not in all circumstances be the "second delivery day." For example, a mailer might enter a Second Day Express Mail piece into the mailstream by the cut-off time on Saturday, where the destination office does not deliver Express

Mail on Sunday, and where Monday is not a holiday. The guaranteed delivery date for that item will be Monday, which happens to be the *first* delivery day, not the second delivery day.

The Postal Service proposes the following language:

Second Day Service is available for delivery on the second day or, in certain circumstances, the second delivery day, as specified by the Postal Service.

This language reflects the fact that a "second delivery day" guarantee for Express Mail occurs only in certain, limited, circumstances. It also accomplishes the Commission's stated objective to "clearly state in the DMCS the scope of Second Day Express Mail Service that the Postal Service intends to provide its customers," Order No. 1462 at 1-2.

The Postal Service awaits the opportunity to reply to any other comments that are submitted this day.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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