

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

Complaint on Stamped Stationery

Docket No. C2004-3

DOUGLAS F. CARLSON
ANSWER IN OPPOSITION TO POSTAL SERVICE MOTION
TO SUSPEND PROCEEDING

May 5, 2006

On May 4, 2006, the Postal Service filed a motion to suspend this proceeding during litigation of the omnibus rate case, which the Postal Service elected to file on May 3, 2006.¹ The Postal Service asserts that “it would be beneficial to the participants, as well as the Commission, to suspend this proceeding pending litigation of the omnibus rate case.” Motion at 2. The Postal Service names no participants whom it believes would benefit from this suspension. The Postal Service identifies no reasons why a suspension would be beneficial. The Postal Service also makes the remarkable assertion that “[n]o harm will be caused by this delay since no stamped stationery issuances at current First-Class Mail rates are planned.” *Id.*

The Postal Service’s motion is a brazen attempt to derail this proceeding. The Postal Service is wrong when it asserts that a delay would cause no harm simply because the Postal Service supposedly does not plan to issue any stamped letter sheets before the current rate case is resolved. *See Id.* at 2. The Postal Service ignores the ongoing harm to the public as the Postal Service continues to sell two different sets of stamped letter sheets at inflated prices. In suggesting a delay, the Postal Service attempts to undermine my statutory right

¹ Reply of United States Postal Service to Statements as to Material Facts Filed Pursuant to Order No. 1460 and Motion to Suspend the Proceeding (“Motion”), filed May 4, 2006.

to seek *and obtain* redress pursuant to 39 U.S.C. § 3662. The Postal Service, of course, did not consult with me before publicly asserting that “participants” would find a suspension beneficial.

The Postal Service also assumes that the public is not interested in the outcome of this case. *Linn’s Stamp News*, a weekly publication with a circulation of 40,000 to 50,000, follows this case closely. *Linn’s Stamp News* has published letters to the editor supporting this case, and the newspaper’s editors called the price of the Disney stamped letter sheets “unconscionable.”²

The Postal Service’s intentions are transparent. If the Postal Service were truly concerned about the burden on itself, the Commission, and participants, the Postal Service would have begun by seeking a delay in Docket No. MC2006-3, a case that the Postal Service filed for the benefit of one mailer on March 29, 2006, when it knew that a rate case was looming on the horizon. If the Postal Service is truly concerned about the burden of multiple cases, the Postal Service should move to suspend Docket No. MC2006-3.

The Postal Service has one and only one goal: To delay this case long enough to ensure that every person who wants to buy the stamped letter sheets will have done so at an inflated price. Then, the Postal Service will implement new First-Class rates, withdraw the stamped letter sheets from sale, and declare the case moot.

If ever a case existed to prove true the adage that justice delayed is justice denied, this case is the one. The Commission should deny the Postal Service’s motion to suspend this proceeding.

Respectfully submitted,

Dated: May 5, 2006

DOUGLAS F. CARLSON

² Douglas F. Carlson Complaint on Stamped Stationery at 5, ¶ 36, filed June 24, 2004.