

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

REPOSITIONABLE NOTES MINOR CLASSIFICATION CHANGE

Docket No. MC2007-2

**NOTICE OF FILING OF REQUEST OF THE UNITED STATES POSTAL SERVICE  
FOR A RECOMMENDED DECISION ON CHANGE OF EXPIRATION DATE FOR  
PROVISIONAL REPOSITIONABLE NOTES CLASSIFICATIONS AND RATES**  
(April 2, 2007)

Pursuant to 39 C.F.R. § 69(e)(3), the Postal Service hereby gives notice that it is filing a Request for a recommended decision as a minor classification change to the expiration date of the current provisional Repositionable Notes (RPN) service. However, while the Request is filed under the rules for expedited minor classification cases (39 C.F.R. 3001-69 *et seq.*), the Postal Service is not requesting the “maximum expedition consistent with procedural fairness” specified in Rule 69(e).

Approximately one year ago in Docket No. MC2006-2, a similar request under the minor classification change rules sought, and the Commission recommended, a change in the expiration date for RPNs to April 3, 2007. Expiration language for RPNs now specifies:

If a request to continue to test or make Repositionable Notes permanent is filed, this provision expires on the implementation date for the replacement service, or if no replacement is implemented, three months after the Commission takes action under section 3624 of title 39, on such request.

See, *e.g.*, DMCS 221.336(a). As such, the act of filing the new Request itself operates to toll the expiration of RPNs.

The instant Request is filed at an exquisitely sensitive time, given the recent passage of the Postal Accountability and Enhancement Act, Public Law 109-435; a consequent rulemaking proceeding, Docket No. RM2007-1; and the recent return to the Commission by the Governors of the Postal Service certain matters for reconsideration in Docket No. R2006-1. Accordingly, the Postal Service Request seeks the retention, without change, of the existing mailer options to enter mailpieces using RPNs. Moreover, the Request brings to the attention of the Commission a procedural option that would minimize the need for dedication of critical resources now focused on other sensitive matters: suspension of this proceeding. A suspension could last until other matters have been addressed, until the filing of a further request involving RPNs whether in the form of one more omnibus proceeding or something RPN specific, or until such other time as the Commission might choose.

The Postal Service's instant Request to change the expiration date is intended to avoid disruption to mailers using or contemplating use of RPNs. The Postal Service also hopes that a settlement of this minor change, or an agreement not to oppose the Request, will be possible.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

Kenneth N. Hollies

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-3083 Fax -3084  
[khollies@usps.gov](mailto:khollies@usps.gov)