

**UNITED STATES OF AMERICA
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001**

Postal Rate and Fee Changes }

DOCKET No. R2006-1

**INITIAL COMMENTS
OF
MAIL ORDER ASSOCIATION OF AMERICA
ON RECONSIDERATION OF
THE RATES FOR STANDARD MAIL REGULAR FLATS**

As its Initial Comments to Commission Order No. 13, the Mail Order Association of America, (“MOAA”) adopts by reference its Answer to Motion of Coalition of Catalog Mailers to Reopen and Supplement the Record filed on April 19, 2007. Copy attached.

With respect to the invitation to comment found on page 13 of the Order, MOAA contends that the readjustment of rates for Standard Mail Regular flats should be on a pro rata basis, the most straightforward and appropriate approach.

Finally, MOAA supports a reduction in the pound rate. The pound rate is demonstrably too high given the complete passthrough of the calculated cost differences between letters and flats. There is no remaining justification for a pound rate at the level recommended by the Commission.

Respectfully submitted

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