

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

COMPLAINT ON BOUND PRINTED MATTER

Docket No. C2008-2

ANSWER OF THE UNITED STATES POSTAL SERVICE
(February 4, 2008)

Pursuant to Commission Rule 82 (39 C.F.R. § 3001.82), the United States Postal Service hereby submits its Answer to the Complaint on Bound Printed Matter, submitted by Douglas F. Carlson. The Postal Service responds to the enumerated paragraphs as follows:

1. No response is required.
2. No response is required.
3. Respondent has insufficient information to admit or deny the allegation.
4. Respondent admits the allegation.
5. Respondent denies the allegation.
6. Respondent denies the allegation.
7. Respondent admits the allegation.
8. Respondent has insufficient information to admit or deny whether individuals and small business mailers “typically” pay postage using postage stamps and PVI labels. In the absence of a showing that only such customers use such postage, Respondent is also unable to admit or deny that over 4.6 million pieces of single-piece Bound Printed Matter were sent by such mailers.

9. Respondent admits the allegation.
10. Respondent admits the allegation, but clarifies that single-piece Bound Printed Matter and Media Mail are not offered at Automated Postal Centers due to their eligibility requirements.
11. Respondent admits that, for eligible matter, Bound Printed Matter may provide the least-expensive shipping method.
12. Respondent denies the allegation. An overall conclusion cannot be drawn from the anecdotal evidence offered.
13. Respondent admits the allegation.
14. To the extent that the allegations argue for, or state, conclusions of law, no response is required. To the extent they may be factual allegations, the Postal Service has insufficient information to admit or deny them.
15. Respondent admits the allegation in the first sentence. Respondent has insufficient information to admit or deny the allegations as stated in the second and third sentences.
16. Respondent admits to the allegation in the first sentence. Respondent denies the allegation in the second sentence; and clarifies that retail associates sell postage to customers, and retail associates accept for mailing Bound Printed Matter items on which the customer has affixed postage.
17. Respondent admits the allegation.
18. Respondent admits the allegation.
19. Respondent denies the allegation.

20. The allegations set forth in this paragraph argue for, or state, conclusions of law to which no response is required. To the extent a response may be deemed necessary, Respondent denies the allegations set forth in this paragraph.
21. The allegations set forth in this paragraph argue for, or state, conclusions of law to which no response is required. To the extent a response may be deemed necessary, Respondent denies the allegations set forth in this paragraph.
22. The allegation sets forth in this paragraph argue for, or state, conclusions of law to which no response is required. To the extent a response may be deemed necessary, Respondent denies the allegation set forth in this paragraph.
23. Respondent denies the allegation. Respondent clarifies that the title of the Postal Regulatory Commission's recommended DMCS section 522.21 reads "Single-Piece Nonpresort Rate Category."
24. Respondent admits the allegations, except that It has no record of the correspondence dated October 20, 2007.
25. Respondent denies the allegation. Respondent pleads affirmatively that the demand for single-piece Bound Printed Matter over the retail counter is very scarce and that customers who wish to send Bound Printed Matter with postage affixed may enter such pieces at the retail window.

To the extent this Answer fails to address with sufficient specificity any allegation in the Complaint, the Postal Service denies such allegations.

Pursuant to Rule 84(b) (39 C.F.R. §3001.84(b)), the Postal Service hereby states its position. In conjunction with this Answer, the Postal Service is filing a Motion to Suspend Proceedings Temporarily. The suspension would allow Postal Service an opportunity to resolve the substance of the instant Complaint without further proceedings. The Postal Service will file an appropriate statement of its position when the suspension tolls or, alternatively, if the motion for suspension is denied.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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