

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

Consideration of Workshare Discount Rate
Design

Docket No. RM2009-3

**COMMENTS OF THE ASSOCIATION FOR POSTAL COMMERCE
CONCERNING ISSUES SPECIFIC TO FIRST CLASS MAIL
IN RESPONSE TO ORDER NO. 243**

The Association for Postal Commerce ("PostCom") hereby submits these comments concerning issues specific to First-Class mail in response to Commission Order No. 243, comments provided during the Commission's public forum held on August 11, 2009, and the Commission's Notice of Inquiry No. 1 issued in this docket on August 27, 2009. PostCom is concurrently filing separate comments concerning issues specific to Standard Mail.

In this proceeding, the Postal Service and a number of other parties have provided comments that weigh heavily against using a benchmark to link prices for single piece and presorted First-Class Mail. PostCom generally supports this position.

Nothing in the statute requires the linking of prices for single piece and presorted First-Class Mail. Furthermore, a rational application of the "just and reasonable"

standard¹ compels that the Commission consider all the relevant factors and objectives and find that Postal Service's prices are just and reasonable.

Respectfully submitted,

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¹ 39 U.S.C. § 3622(b)(8).