

**BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON DC 20268-0001**

REVIEW OF PRICE ADJUSTMENT)
AND CLASSIFICATION CHANGES)
RELATED TO MOVE UPDATE)
ASSESSMENTS)

Docket No. R2010-1

**COMMENTS OF
NATIONAL ASSOCIATION OF PRESORT MAILERS
ON ORDER NO. 318
(November 4, 2009)**

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The National Association of Presort Mailers respectfully submits the following comments on the *United States Postal Service's Notice of Market Dominant Price Adjustments and Classification Changes Related to Move Update Assessments* (the "Notice") filed with the Commission on October 15, 2009.

In the Notice, the USPS asserts that a calculation of a First-Class price cap is not really appropriate because the change actually reduces the amount a mailer would have to pay in the event it failed MERLIN Performance Based Move Update verification ("MERLIN PBMUV"). This assertion simply ignores the fact that what the Postal Service is doing is denying mailers the right to use services, forwarding and return of undeliverable as addressed ("UAA") First-Class mailpieces (and the destruction of UAA Standard Mail mailpieces) despite the fact that the postage paid covers those services. The prices that the USPS placed in effect following R2006-1 included the full cost of forwarding and returning First-Class UAA mailpieces. They also included the cost of destroying UAA Standard Mail mailpieces. Now, the USPS wants to finally deny mailers