

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

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**Periodic Reporting of Service  
Performance Measurements and  
Customer Satisfaction**

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**Docket No. RM2009-11**

**REPLY COMMENTS OF BANK OF AMERICA CORPORATION**

The Bank of America Corporation (the Bank) respectfully submits these reply comments in response to Postal Regulatory Commission (Commission) Order No. 320, issued October 21, 2009.

As anticipated in the Commission's Notice of Proposed Rulemaking, the Postal Service's initial comments raise legitimate concerns about the potential burden imposed by the proposed service performance reporting requirements.<sup>1</sup> The Bank shares the Postal Service's interest in minimizing the implementation costs and the administrative burden of the service performance reporting requirements. However, the Postal Service's initial comments did not provide sufficient information to allow the Commission or interested parties to determine how best to minimize the administrative burden without significantly reducing the value of the service performance reports to the Commission and the mailing community. Specifically, the Postal Service's initial comments do not quantify the costs associated with reporting requirements deemed unduly burdensome, nor do the comments propose specific modifications to mitigate the perceived burden.

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<sup>1</sup> See Docket No. RM2009-11, Notice of Proposed Rulemaking on Periodic Reporting of Service Performance Measurements and Customer Satisfaction (September 2, 2009), at 2; United States Postal Service Comments in Response to Order No. 292 (Nov. 2, 2009), at 3-5, 8-9, 16, 40-42, and 49-50.

To facilitate an informed discussion regarding the proper balance between the costs and benefits of the proposed service performance measurement reporting rules, the Commission should consider providing the Postal Service with another opportunity to (1) quantify the cost of specific requirements that it views as particularly burdensome, and (2) propose focused adjustments to mitigate the perceived burden. After providing interested parties with a forum to respond to the Postal Service's proposals, the Commission will be in a better position to modify the proposed rules, as appropriate.

Respectfully submitted,

/s/

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