

Before the
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Mail Classification Schedule Change
(Network Distribution Center)

Docket No. MC2010-19

PUBLIC REPRESENTATIVE COMMENTS IN RESPONSE TO UNITED STATES
POSTAL SERVICE FILING NOTICE OF CHANGE IN TERMINOLOGY FROM
BULK MAIL CENTER (BMC) TO NETWORK DISTRIBUTION CENTER (NDC)

(March 10, 2010)

In response to Order No. 415¹, the Public Representative hereby comments on the February 26, 2010, Notice of United States Postal Service for a classification change (Notice) reflecting new terminology: from “Bulk Mailing (sic) Center” (BMC) to “Network Distribution Center” (NDC). The Postal Service also revises its regulations, updating the term in *Mailing Standards of the United States Postal Service*, the Domestic Mail Manual and other related manuals and publications, effective March 15, 2010. The Postal Service notes that the term abbreviated as “BMC” will be revised in 39 CFR part 121, Service Standards for Market-Dominant Mail Products.

What’s in a name? [T]hat which we call a rose

By any other name would smell as sweet [...]²

-- William Shakespeare, *Romeo and Juliet*, (II, ii, 47-8)

Before the Bulk Mail Centers (BMCs) have made their last dispatch of value (DOV), they now must yield to NDCs, as the Postal Service takes “another step towards

¹ Commission Order 415, *Notice and Order Concerning Classification Changes*, March 2, 2010.

² Juliet opines that a name does not define a person or thing – the essence should determine attributes, including appellation. In all things, substance and/or function should trump form and/or categorization.

implementation of the NDC concept by effecting the name change.” Notice, at 2.

Implementation of the concept began in 2009, and labeling lists reflecting the change have been printed. *Id.*

Despite the relative insignificance of this change (when measured in the context of the myriad issues the people of this Nation currently strive to resolve), it is gratifying that the Postal Service would make the time and effort to announce a change in postal vernacular. Pursuant to 39 CFR 3020.92, the Commission provides notice of the Postal Service’s filing and affords interested persons an opportunity to express views and offer comments on whether the proposed language change comports with 39 U.S.C. 3642 – procedures for transfer of items between the market dominant and competitive product lists, and revision of the lists and related publications. While the Notice and Commission’s Orders in this (and other) matter(s) are published both in an internet-accessible docket and in the *Federal Register*, any lack of comments or views in this (or any other docket) does not diminish the importance of accountability and transparency, championed by the Postal Accountability and Enhancement Act of 2006.

One could parse (in a number of ways) the postal terminology in focus, but customers, postal employees and casual observers would likely agree that “network distribution” as a modifying phrase is superior to its predecessor. The analysis posited by the Bard’s heroine, when applied here also produces a satisfying result.³ Both

³ Significantly, a failure in conveyance of a letter set in motion the tragic denouement of *Romeo and Juliet*. Those who can appreciate the power of the posts praise speed, accuracy and accountability (whether in iambic pentameter or 65-bar Intelligent Mail barcode (IMb)).

“network” and “distribution” convey scope and activity beyond an individual “center”; the very essence of “bind[ing] the Nation together” (39 U.S.C. 101(a)).

The general public should be loath to interrupt a step forward. Furthermore, the Notice complies with provisions of 39 U.S.C. 3642 and Commission rules of procedure. Accordingly, the general public endorses the new term, national distribution center (NDC).

The Public Representative respectfully submits the preceding Comments for the Commission’s consideration.

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