

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

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**Notice of Price Adjustment**

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**Docket No. R2010-3**

**COMMENTS OF PITNEY BOWES INC.**

Pursuant to Postal Regulatory Commission (Commission) Order No. 416, issued March 2, 2010, Pitney Bowes, Inc. (Pitney Bowes) files these comments in support of the Postal Service's proposed Standard Mail Volume Incentive Pricing Program, "Summer Sale 2010."

Similar to the incentive pricing programs introduced last year, the Summer Sale 2010 is an appropriate exercise of the enhanced pricing flexibility afforded the Postal Service under the Postal Accountability and Enhancement Act (PAEA).<sup>1</sup> Like its predecessor program, the objective of the Summer Sale 2010 is to increase incremental Standard Mail volumes and revenues. The Postal Service expects the Summer Sale 2010 program to generate between 311 million and 1.1 billion incremental Standard Mail pieces and estimates an incremental revenue increase of \$34 million to \$157 million. *See* United States Postal Service Notice of Market-Dominant Price Adjustment (Feb. 26, 2010), at 5-6.

The Summer Sale 2010 program will not solve the Postal Service's current financial problems, but the revenue generated will help and the innovative thinking it demonstrates is necessary for future success of the Postal Service. Pitney Bowes

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<sup>1</sup> *See* Pub. L. 109-435, 120 Stat. 3218 (Dec. 20, 2006).

commends the Postal Service for exercising the new pricing flexibility provided by PAEA. Pitney Bowes has consistently supported and encouraged the concept of seasonal rates to stimulate mail volumes and promote the use of mail.<sup>2</sup>

Consistent with these views, Pitney Bowes strongly supports the Summer Sale 2010 program and is committed to working with the Postal Service to ensure that our shared customers can take full advantage of this opportunity.

Respectfully submitted,

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/s/

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<sup>2</sup> Initial Comments of Pitney Bowes Inc. in Response to Advance Notice of Proposed Rulemaking on Regulations Establishing a System of Ratemaking (Dkt. No. RM2007-1)(April 6, 2007) at 12, 13; Comments of Pitney Bowes Inc. on the United States Postal Service Proposal for a Summer Sale Program (Dkt. No. R2009-3)(May 21, 2009).