



ASSOCIATED MAIL & PARCEL CENTERS

"the voice of the mail & parcel industry"

Postal Regulatory Commission

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Order No.423
Docket No. MC2010-20

Request of the United States Postal Service Transferring Selected Post Office Box Service Locations to the Competitive Product List.
Comments by Associated Mail & Parcel Centers (AMPC)

AMPC is a 28 year old trade association that has represented as many as 3500 mail and parcel stores in the United States along with stores in Canada and Europe. As the advocacy group for this industry AMPC wishes to provide comments to the reference request.

Most of the mail and parcel stores that are members of AMPC are Commercial Mail Receiving Agents which offer enhanced Private Mail Box (PMB) services. This service established in the early 1900's is an essential source of revenue (in some cases the single source of revenue), without which many stores will close.

While the testing of prices under the less stringent rules of Competitive Products over Market Dominate Products, in the beginning is an attempt to raise the revenue of the Post Office Boxes to more closely reflect the market price of PMBs, AMPC cautions the opening of competition by Post Office Boxes to a regulated and controlled aspect of PMB rentals to a changed product that more closely resembles a private offering. Currently a dissimilar product, many PMB locations enhance the mail receiving services by including email notification, street addresses, call-ins, free fax services, accepting private carrier packages, and store discounts among other services. For the USPS to consider changing their product in the future is a concern for AMPC members in light of the USPS resources and tax benefits.

AMPC advocates a pricing of POBs that is in line with the private offerings, but objects to any changes in the product itself as the USPS does not currently have a completely parallel product to PMBs and the development of such a product will be an incursion on commerce.

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