

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

TRANSFERRING SELECTED POST OFFICE BOX SERVICE LOCATIONS TO THE COMPETITIVE PRODUCT LIST DOCKET NO. MC2010-20

DAVID B. POPKIN MOTION

March 25, 2010
MOTION UNDER SEAL

Respectfully submitted,

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On March 12, 2010, the United States Postal Service filed Attachment D which redacted the number of boxes rented in each of the five sizes of boxes and the total annual box rent revenue at each of the 52 facilities listed in the proposed Docket. The Postal Service has also filed a request as Attachment C to place this data under seal.

The Postal Service claims that revealing box usage and box revenue at competitive locations would result in commercial harm. It has yet to be shown that any of these 52 locations are competitive with respect to their post office box service.

EXISTING AVAILABILITY OF THIS DATA

There are many instances where this data is now or in the past been publically available.

- A. The Postal Service's own website shows for all of its facilities the size of boxes at that facility and whether or not that size is available for rental.
- B. Recently post offices were directed to post "PLEASE RENT ME" stickers on the unrented boxes in their facility. This would allow the public to visit the facility and determine the number of boxes in use.
- C. In the past, the Postal Service provided data on the number of post office boxes at each of its facilities. When the data was free of charge, I obtained the local data. When a charge was instituted, I no longer received the data.

- D. There is presently a website www.melissadata.com that provides post office box usage and data - some records are available free of charge and others require payment of a fee.

NEED FOR THIS DATA

- A. I believe that the percentage of boxes rented at a given facility is related to the level of potential competition. There is a big difference between having 10% of the available boxes rented as opposed to having 90% of the available boxes rented.
- B. The same would also apply to the competitor's facility.
- C. The distribution of the size 4 and size 5 boxes is significant since there is less on average of 7 size 4 boxes and 1 size 5 box per facility. If these are not in general use, perhaps those sizes should be excluded from the Docket.
- D. Whether or not the competitor's facility has or does not have that size box available is significant.

COMMENTS

For the reasons stated, I request the Postal Service remove the redaction from their attachment. Furthermore, the data will lose any value well before the expiration of the ten year period requested.