

Before the
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Modification of Mail Classification Schedule
Product Lists in Response to Order No. 154

Docket No. MC2009-19

PUBLIC REPRESENTATIVE COMMENTS
IN RESPONSE TO ORDER No. 449
(May 19, 2010)

On January 13, 2010, the Commission issued Order No. 391, which approved the addition of several postal services to the Mail Classification Schedule (MCS). The Commission directed that the Postal Service file draft product descriptions for eight existing services that were to be included in Address Management Services. The Commission also directed the Postal Service to make a filing to add Stamp Fulfillment Services to the MCS. The Postal Service responded on, respectively, February 23¹ and April 26, 2010.² On April 28, 2010, pursuant to 39 C.F.R. 3020.33, the Commission issued notice of those filings and solicited comments from interested persons.³ The Public Representative hereby responds.

With respect to Stamp Fulfillment Services (SFS), the Postal Service filed draft MCS language and the statement of justification required by 39 C.F.R. 3020.32. In the statement of justification, Khalid Hussain, Manager, Stamp Fulfillment Services, explained that the product and prices are already in existence and are not being changed by the addition of MCS language.⁴ He stated that details of SFS appear in the

¹ First Response of the United States Postal Service to Order No. 391, Amending Requested MCS Language for Address Management Services, February 23, 2010.

² Request of the United States Postal Service to Add Stamp Fulfillment Services to the Mail Classification Schedule in Response to Order No. 391, April 26, 2010.

³ Notice and Order Concerning the Addition of Address Management Services Product Descriptions and Stamp Fulfillment Services to the Mail Classification Schedule, April 28, 2010.

⁴ April 26 Request, Attachment B.

USA Philatelic catalog. The Public Representative has verified that the information in the proposed MCS language is consistent with the shipping charges in volume 15, quarter 4 of *USA Philatelic* (available in the Commission's reception area). Appendix A is a copy of the relevant page from *USA Philatelic*. The Public Representative supports the addition of SFS to the MCS.

With respect to Address Management Services, the Postal Service provided its proposed changes to the MCS in legislative format as Attachment A to its February 23 Notice. The changes are as follows.

- A description of "Advance Notification and Tracking System"
- Additional descriptive material for "Computerized Delivery Sequence"
- A description of "Manifest Analysis and Certification Batch System Certification"
- A description of "Manifest Analysis and Certification Gold System Certification"
- A description of "Manifest Analysis and Certification System Certification"
- Deletion of "Mailpiece Quality Control Certification"
- Addition and Description of "NCOA^{LINK} Mail Processing Equipment"
- A description of "Presort Accuracy, Grading, and Evaluation System Certification"
- A description of "Presort Accuracy, Validation, and Evaluation System Certification"
- A description of "Z4INFO"
- Addition and Description of "99 Percent Accurate Method"
- Deletion of "Cartridge" from "CRIS Route" prices
- Deletion of "Cartridge" from "City State" prices
- Deletion of "Cartridge" from "Delivery Statistics" prices
- Deletion of "System" from "DPV System" prices
- Deletion of "Cartridge" from "Five-Digit ZIP" prices
- Deletion of "Cartridge" from "Z4 Change" prices
- Deletion of "Cartridge" from "ZIP + 4 Service" prices
- Deletion of "Cartridge" from "ZIP Move" prices
- Addition of "99 Percent Accurate Method" prices

All of these changes but one are mentioned in the February 23 Notice. The deletion of “System” from “DPV System” prices is not discussed. This change may be inadvertent, and it does not appear to have significance. The Public Representative supports the remaining changes.

Respectfully submitted,

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