

Before the
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Modification of Mail Classification Schedule
Regarding Address Management Services

Docket No. MC2010-25

COMMENTS OF THE PUBLIC REPRESENTATIVE
IN RESPONSE TO ORDER NO. 483

On July 2, 2010, the Postal Service filed a notice of two changes to the mail classification schedule (MCS).¹ On July 6, 2010, the Commission established Docket No. MC2010-25 to review the MCS changes.² Order No. 483 also designated the undersigned as Public Representative. *Id.* at 2. The MCS changes relate to Address Management Services. The Postal Service has eliminated a service called Delivery Type. This service identifies the delivery types (e.g., P.O. Box or Street) made within a 5-digit ZIPTM Code area. According to the Postal Service, the “service is limited, outdated, and not widely used.” Notice at 1. The number of customers for the service so far in 2010 is 19. *Id.* Two other services—City State and Delivery Statistics—provide the same information as Delivery Type, although at a somewhat higher price. The information available through City State and Delivery Statistics is also more up to date. Some current Delivery Type customers could obtain the information they need from another service—AIS Viewer—at the same price as Delivery Type.

¹ Notice of the United States Postal Service of Classification Changes Related to Address Management Services, July 2, 2010 (Notice).

² Notice and Order Concerning Classification Changes Related to Address Management Services, July 6, 2010 (Order No. 483).

The second change in the MCS is the elimination from the MCS of the type of media (disc, DVD, or CD ROM) used to distribute information to customers. According to the Postal Service, the elimination of these media types will expand the options available to customers. *Id.* at 2.

The Postal Service has filed these changes to the MCS under the “corrections” rules—39 CFR 3020.90-91. These rules clearly apply to the elimination of media type from product descriptions and prices. However, the elimination of Delivery Type as a service offering seems to involve a change in the market dominant product list that should have been filed under subpart D of part 3020, title 39, CFR. If any customers file comments opposing this change, the Commission should require the Postal Service to refile and provide the documentation required by section 3020.72.

Respectfully submitted,

Emmett Rand Costich
Public Representative

901 New York Ave. NW, Ste 200
Washington, DC 20268-0001
202-789-6833, FAX -6861
rand.costich@prc.gov

