

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

MODIFICATION OF MAIL CLASSIFICATION SCHEDULE
REGARDING ADDRESS MANAGEMENT SERVICES

Docket No. MC2010-25

REPLY OF THE UNITED STATES POSTAL SERVICE TO
COMMENTS OF THE PUBLIC REPRESENTATIVE
IN RESPONSE TO ORDER NO. 483
(July 14, 2010)

On July 13, 2010, the Public Representative (PR) provided comments on the Postal Service's July 2, 2010 notice of two changes to the Mail Classification Schedule language for the Address Management Services product. The Postal Service's notice was filed under the 39 CFR, part 3020, subpart E rules for updating the MCS product descriptions. The Public Representative argued that "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." PR Comments at 2.

The Postal Service disagrees. The elimination of Delivery Type service does not "constitute a proposal to modify the market dominant product list", since the Address Management Services product in the product list would be preserved. See 39 CFR §3020.91; Order No. 43 at 107-108. The notice concerns the elimination of one price category in the Address Management Services product, and, as explained in the Postal Service's notice, Address Management Services would continue to provide the services offered by Delivery Type, through other components of that product. Thus, the

Commission's statement that "[a] proposed update [filed under 39 CFR § 3020.90] may not change the nature of a service to such an extent that it effectively creates a new product or eliminates an existing product" (Order No. 26 at 97), does not apply here.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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