

Before the
POSTAL REGULATORY COMMISSION
Washington, DC 20268-0001

**TRANSFERRING COMMERCIAL STANDARD
MAIL PARCELS TO THE COMPETITIVE
PRODUCT LIST**

Docket No. MC2010-36

**PARCEL SHIPPERS ASSOCIATION
&
DIRECT MARKETING ASSOCIATION**

SECOND MOTION FOR ISSUANCE OF INFORMATION REQUEST

The Parcel Shippers Association (PSA) and the Direct Marketing Association (DMA), pursuant to Rule 3001.21(a), hereby move the Commission to issue a Second Commission Information Request ("CIR"), seeking information necessary to fully understand the vulnerability of Standard Mail fulfillment Parcels to competition as that relates to whether such parcels are not market dominant, under 39 U.S.C. § 3642 (b) and 39 C.F.R. § 3020.32 (d), as claimed by USPS. In the past the Commission has recognized that participants may bring issues to its attention that should be raised in a formal request, such as a CIR.¹ Therefore, PSA/DMA request that the Commission issue a CIR directing the Postal Service to report to the Commission and the public their answers to the following questions:

1. What percentage of Standard Mail NFM/Parcels is small enough to be delivered to a mailbox? Please provide all underlying calculations.
2. What percentage of Standard Mail Parcels is small enough to be delivered to a mailbox? Please provide all underlying calculations.

¹ See Docket No. RM2008-4, Order No. 203 (April 16th, 2009), and Docket No. R2010-4, POIR No. 5, dated August 18th, 2010.

3. What percentage of Standard Mail commercial Fulfillment Parcels is small enough to be delivered to a mailbox? Please provide all underlying calculations.
4. What percentage of parcels weighing between 1 and 5 pounds is small enough to be delivered to a mailbox? Please provide all underlying calculations.
5. What percentage of over-5 pound parcels is small enough to be delivered to a mailbox? Please provide all underlying calculations.
6. What percentage of Parcel Select parcels is small enough to be delivered to a mailbox? Please provide all underlying calculations.
7. Please provide the Postal Service's unit delivery cost for (a) parcels that are delivered to a mailbox; and (b) parcels that are too large to be delivered to a mailbox. Please provide all underlying calculations.

Respectfully submitted,

<p>Timothy J. May Patton Boggs LLP 2550 M Street, N.W. Washington, DC 20037 tmay@pattonboggs.com & James Pierce Myers Attorney at Law 1420 King Street Suite 620 Alexandria, VA 22314 jpm@piercemyers.com Counsel for Parcel Shippers Association</p>	<p>Jerry Cerasale Senior Vice President, Government Affairs Direct Marketing Association 1615 L St, NW, Suite 1100 Washington, DC 20036 202-861-2423 jcerasale@the-dma.org</p>
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Dated: September 8, 2010