Postal Regulatory Commission
Submitted 11/17/2010 9:48:13 AM
Filing ID: 70876
Accepted 11/17/2010

As the owner of a The UPS Store franchise in **[Forest Lake, MN]**, I respectfully submit the following comments in response to Docket No. CP 2011-26, dated November 2, 2010.

The USPS proposed changes to its PO Box services in its filing of March 12, 2010 (Docket MC 2010-20). In its approval of that filing, the PRC acknowledged the concerns raised in numerous public comments, stating:

> "The concerns raised by these commenter's are not insignificant. They are, however, premature. First, the Postal Service's proposal is narrowly tailored, involving a limited number of locations and no changes in fees or services. Potential changes in the nature of P.O. Box Service are not before the Commission in this proceeding. If, in the future, the Postal Service proposes to offer ancillary P.O. Box Services, these issues can be raised."
> *(Order No 473, 06/17/2010, Docket MC 2010-20)*

In the USPS proposal submitted to the PRC on November 2, 2010 *(Docket CP 2011-26)*, the only specific reference to PO Box services comes on Page 3 of the filing, which states that "49 Post Office Box locations recently added to the competitive product list are designated under a new fee group, C1."

However, in its own recent announcement of the proposed price increases, the USPS states that:

> Pricing for 50,000 Post Office Boxes in 49 retail Post Offices will change to reflect a new pricing schedule based on their presence in areas where significant competition exists. **Post Office Boxes at these Post Offices have been classified as competitive products, allowing the Postal Service to test consumer interest in enhancements to current service and help shape future offerings.**
> *(USPS Release No. 10-103, dated November 2, 2010)*

The wording in this USPS release clearly implies that (1) the USPS is interested in pursuing "enhancements to current services" and (2) the USPS interprets PRC Order No 473 to mean that the USPS is free to pursue these changes.

I therefore support the position of the Independent Coalition of Franchise Owners (ICFO) and the AMPC that the following directive be restated by the PRC and understood by the USPS:

It is emphasized that if the Postal Service proposes to offer ancillary PO box services or other enhanced services related to the Recipient Service of Post Office Boxes, any and all such enhanced services must be proposed to the PRC and subjected to public review and comment.

Respectfully submitted for the Commission's consideration by John Murphy Forest Lake, MN