

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

TEMPORARY WAIVERS FROM PERIODIC  
REPORTING OF SERVICE PERFORMANCE  
MEASUREMENT

Docket No. RM2011-1

**REPLY COMMENTS OF THE UNITED STATES POSTAL SERVICE**  
(December 6, 2010)

In response to the Commission's Order No. 552,<sup>1</sup> the United States Postal Service hereby provides its reply to comments on the Postal Service's request for temporary waivers from the periodic reporting of service performance for certain market dominant products. Four sets of parties filed initial comments in this docket.<sup>2</sup> The Association for Postal Commerce and the Direct Marketing Association (collectively, "PostCom/DMA"), the Parcel Shippers Association ("PSA"), and the Public Representative seek rejection of the request with respect to various products or product components, although the Public Representative explicitly (albeit conditionally) supports the Postal Service's request as to quarterly, district-level First-Class Mail Flats reporting and Stamp Fulfillment Services. These parties make suggestions for alternative

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<sup>1</sup> PRC Order No. 552, Notice and Order Concerning Filing of Postal Service Request for Temporary Waivers from Periodic Reporting of Service Performance Measurement, Docket No. RM2011-1, October 4, 2010, at 2-3. In Order No. 587, Order Rescheduling the Dates for Filing of Comments and Reply Comments, Docket No. RM2011-1, November 16, 2010, the Commission extended the deadlines for comments and reply comments, establishing the latter as being due December 6, 2010.

<sup>2</sup> Comments of the Association for Postal Commerce and the Direct Marketing Association: Order No 552, Docket No. RM2011-1, November 24, 2010 (hereinafter "PostCom/DMA Comments"); Parcel Shippers Association Comments on the United States Postal Service Proposed Temporary Waivers for Reporting of Service Performance Measurement, Docket No. RM2011-1, November 24, 2010 (hereinafter "PSA Comments"); Public Representative's Initial Comments in Response to Postal Service Request for Temporary Waivers from Periodic Reporting of Service Performance Measurement, Docket No. RM2011-1, November 24, 2010 (hereinafter "PR Comments"); Valpak Direct Marketing Systems, Inc. and Valpak Dealers' Association, Inc. Initial Comments Regarding Temporary Waivers from Periodic Reporting of Service Performance Measurement, Docket No. RM2011-1, November 24, 2010 (hereinafter "Valpak Comments").

methods of reporting in lieu of the proposals outlined by the Postal Service.<sup>3</sup> Valpak Direct Marketing Systems, Inc., and the Valpak Dealers' Association, Inc. (collectively, "Valpak"), seek clarification that any temporary waivers will not affect Standard Mail variance reporting and that any temporary waivers granted in this proceeding will not extend beyond the end of FY 2011, subject to the Postal Service's right to request continuation if warranted. The Postal Service responds to specific aspects of the parties' comments as follows.

**I. Commercial First-Class Mail Parcel and Package Services Items**

The Postal Service has advised that there is no current method to start the measurement clock for non-retail First-Class Mail Parcels and Package Services items. Therefore, the Postal Service has requested a temporary waiver in order to allow time for implementing a start-the-clock methodology based on the first en-route scan.

**A. Nature of Request**

As an initial matter, Order No. 465 does not require the Postal Service to report retail and commercial items separately. Therefore, one could construe this aspect of the Postal Service's request as more properly concerning measurement and proxy timetables than whether products' performance can be reported at all. The Postal Service concedes that, strictly speaking, a temporary waiver proceeding might not be the appropriate context for notifying parties of a matter specific to measurement of commercial items within a given product category. After all, the Postal Service is fully

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<sup>3</sup> See United States Postal Service Response Request for Temporary Waivers from Periodic Reporting of Service Performance Measurement (hereinafter "USPS Waivers Request"), Docket No. RM2011-1, October 1, 2010; Responses of the United States Postal Service to Chairman's Information Request No. 1 (hereinafter "CHIR1 Response"), Docket No. RM2011-1, November 12, 2010. The Postal Service filed errata to its CHIR1 Response on November 19, 2010; any reference herein to the Postal Service's CHIR1 Response encompasses the errata as well, where relevant.

prepared to comply with its obligation to report performance figures for these product categories, so long as it is understood that these figures rely only on retail items. The Public Representative aptly recognizes that, whether the Commission approves or denies the Postal Service's request, such action would not alter the fact that the Postal Service will report First-Class Mail Parcels on the basis of Single-Piece First-Class Mail Parcels with Delivery Confirmation.<sup>4</sup>

In an abundance of caution and transparency, however, the Postal Service considered it better to include the commercial-parcels discussion in its temporary waiver filing, in the event that the Commission or other parties could construe the delayed *inclusion* of non-retail items in these products' reporting as a failure to comply with the reporting obligation as such. To the extent that one might consider the change in start-the-clock events for commercial parcels, or any other methodological or proxy issues discussed in the Postal Service's request, to be a change in measurement systems or reporting methodologies under 39 C.F.R. § 3055.5,<sup>5</sup> then the Postal Service respectfully asks that its request for temporary waivers be deemed notice under that Commission Rule. The Postal Service's submissions in this proceeding more than fulfill the 30-day requirement and the descriptive elements for such a notice. This proceeding has given the Commission and interested parties ample opportunity to consider any "impact on the accuracy, reliability, or utility of the reported measurement [or] on the characteristics of the underlying product[s]," as shown by the Chairman's Information Request and the

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<sup>4</sup> PR Comments at 9. This remark presumably applies to the corresponding request for commercial Package Services items as well, for which the Public Representative recommends denial of the waiver request for the same reasons as commercial First-Class Mail Parcels. *See id.* at 19.

<sup>5</sup> *See* PostCom/DMA Comments at 5.

various comments on the merits of the changes.<sup>6</sup> Under the circumstances, even if an arguable failure to invoke 39 C.F.R. § 3055.5 has occurred, as PostCom/DMA contends, this formalism should not overshadow the substance of Postal Service's request or result in duplicative proceedings.

### **B. Alternative Start-the-Clock Methods and Data**

The Postal Service proposes to use the first en-route scan to start the clock because of problems that have arisen with the use of electronic documentation, as originally planned.<sup>7</sup> According to PostCom/DMA, PSA, and the Public Representative, however, reliance on the first en-route scan, without further augmentation or qualification, would "introduce[ ] another form of inaccuracy" by excluding time that a parcel spends in the Postal Service's custody before it receives the first en-route scan.<sup>8</sup> PSA alleges that this time can vary significantly from a few hours to several days.<sup>9</sup> To remedy the perceived flaw in the Postal Service's proposal, the parties suggest various alternatives. The Public Representative supports development of an adjustment factor to be used in conjunction with the first en-route scan.<sup>10</sup> PSA and PostCom/DMA urge the Postal Service "work with industry" on some other business rules and to add eVS-manifested and -uniquely barcoded parcels to measurement in the meantime.<sup>11</sup> PostCom/DMA also questions whether the Postal Service could use pallet scans as a start-the-clock event for parcels.<sup>12</sup>

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<sup>6</sup> The Postal Service notes that the Commission's rules do not require initiation of a proceeding on any such notice. 39 C.F.R. § 3055.5 ("The Commission *may* initiate a proceeding at any time to consider such changes[.]" (emphasis added)).

<sup>7</sup> CHIR1 Response at 10-11.

<sup>8</sup> PR Comments at 8; see *a/so* PostCom/DMA Comments at 14-15; PSA Comments at 4-5.

<sup>9</sup> PSA Comments at 4.

<sup>10</sup> PR Comments at 8-9.

<sup>11</sup> PostCom/DMA Comments at 15-16; PSA Comments at 5-6.

<sup>12</sup> PostCom/DMA Comments at 15.

The Postal Service does not oppose any of these suggestions outright, but they may present more complexities than appear on first glance. The Postal Service is willing to work with industry to reach mutually acceptable processes, as shown by the development of the pallet scan start-the-clock method for First-Class Mail letters and flats cited in PostCom/DMA's comments.<sup>13</sup> However, reliance on such a method for commercial parcels would require mailer adoption of the Intelligent Mail package barcode (IMpb) format, the corresponding file format, the Intelligent Mail container placard, and nesting of item-level information to respective pallets and container placards with sufficiently high data quality. It is possible that not enough mailers would adopt the IMpb barcode and file formats to allow reliable reporting for some time, resulting in a situation similar to that described in the Postal Service's temporary waiver request for Standard Mail letters and flats and Periodicals.

It hardly need be said that the intent behind the Postal Service's first en-route scan proposal is not to increase inaccuracy or to game an internal measurement system, but to seek a relatively reliable fallback for the previous start-the-clock method, which low mailer adoption has rendered elusive. Even with the use of the first en-route scan, the Postal Service would seek to mitigate variability in pre-scan transit times by excluding pieces that receive a first en-route scan significantly downstream from the facility responsible for origin/entry processing and recorded acceptance point.<sup>14</sup>

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<sup>13</sup> *Id.*

<sup>14</sup> Planned business rules would govern the inclusion or exclusion of items from measurement based on the origin/entry induction location in the electronic documentation, facility processing responsibility by ZIP Code area, and the location of the first en-route scan. The only exception is for items in sacks that bypass individual piece handling and are first scanned downstream. Upon developing business rules for these items, the Postal Service will assess the effect on service measurement and the necessity of further procedural steps under the Commission's rules.

An adjustment factor, as the Public Representative proposes, could also be an appropriate way to bridge the potential pitfalls of the first en-route scan method. This would require some time for study and information technology development. Depending on the level of complexity to any adjustment factor or factors, the Postal Service would need to establish additional business rules to differentiate between pieces that are first scanned at facilities relatively close to acceptance and pieces that are not scanned until further downstream. Given the sensible nature of this proposal and the practicalities it entails, it is unclear why the Public Representative concludes that the Commission must deny a temporary waiver, if one is necessary at all for the delayed inclusion of data for the commercial subsets within the First-Class Mail Parcels and respective Package Services reporting categories. If anything, a temporary waiver would be all the more necessary to clarify that the Postal Service's efforts to implement even more reliable performance reporting do not place it out of compliance.

## **II. Standard Mail and Periodicals**

### **A. Range Documentation**

#### **i. Mailer-Dependent Data Availability**

The Postal Service has requested temporary waivers for Standard Mail based on three sets of difficulties. First, current Postal Wizard and Intelligent Mail® range documentation – which was designed for verification and accounting, not for service performance measurement – does not currently distinguish the product categories of the respective pieces within a shipment.<sup>15</sup> This means that, although these items' performance can be measured, that measurement cannot be allocated to product

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<sup>15</sup> PostCom/DMA asks whether this request applies to Standard Mail flats only or to letters and parcels as well. *Id.* at 18. The request applies to Standard Mail letters and flats.

categories for product-specific reporting in accordance with Order No. 465. The Postal Service is implementing systems changes to enable this functionality in January and May 2011,<sup>16</sup> but the actual generation of reliable, reportable data depends on the pace of mailer compliance. Similar issues hamper the Postal Service's ability to weed out Within-County items from electronic documentation for Periodicals, in order to enable reliable product-specific reporting for Outside-County Periodicals.

The Postal Service has been frank in its belief that two or more years is a realistic estimate for mailer adoption in light of past experience. If meeting the Commission's preferred timetable of December 2011 is an unmitigated priority for the Commission, the mailing industry, and the public, however, then the Postal Service would welcome the mailing industry's commitment to prompt cooperation in advance of that deadline. Without that commitment, the Postal Service is compelled to abide by its request that the Commission's timetable account for the practical reality of mailer-dependent data availability.

## **ii. External Measurement and Interim Reporting**

The Public Representative recommends either scrapping the Postal Service's measurement plans altogether in favor of an external measurement system or, apparently as a less preferred alternative, establishing a permanent docket to receive the Postal Service's quarterly status reports.<sup>17</sup> The former suggestion is patently unworkable. At the November 17, 2010, technical conference, the Postal Service

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<sup>16</sup> PostCom/DMA expresses confusion on this point. *Id.* at 18-19. The Postal Service clarified the schedule for PostalOne! modifications in response to informal questions at the November 17, 2010, technical conference. Supplemental Information of the United States Postal Service in Response to Informal Questions Regarding Standard Mail Implementation Milestones Posed at Technical Conference, Docket No. RM2011-1, December 2, 2010.

<sup>17</sup> PR Comments at 4-5, 15.

explained why external measurement is a poor fit for Standard Mail. In contrast with the anonymity of Single-Piece First-Class Mail, Standard Mail's users consist exclusively of business entities with a known mailing relationship. A tester would have to establish a dummy company or companies to tender Standard Mail test items. This would be unduly burdensome and expensive for the tester (and for the Postal Service as its contract customer), and it is more likely than First-Class Mail to be transparent to Postal Service personnel.<sup>18</sup> The same is true of a tester that works through existing Standard Mail customers, with the added threat of the test items' transparency to those customers as well. More importantly, the system's scope and cost would likely be staggering in light of the disaggregated reporting levels required by the Commission's rules and the need for sufficient measured volume to achieve statistical reliability.<sup>19</sup> Therefore, external measurement should not be a leading contender for the goal of product-specific Standard Mail measurement.

Although the Postal Service finds nothing objectionable in the latter suggestion for quarterly reports, it is somewhat puzzling, because the Commission will receive the Postal Service's quarterly reports regardless. By urging the requirement of quarterly reports without a waiver or other accommodation, the Public Representative presumably means to suggest that the Postal Service report whatever scant product-level data may be available in the interest of complying with the Commission's rules.

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<sup>18</sup> Cf. United States Postal Service Response to Comments of the Public Representative, Docket No. RM2010-11, August 12, 2010, at 8 (describing similar difficulties that would be posed by independent, external measurement of Alternative Postage Payment Services).

<sup>19</sup> The level of disaggregation in the Commission's service performance reporting rules already threaten to increase the cost of existing external measurement systems, just as the Great Recession and other financial pressures make the Postal Service less able than ever before to bear such added cost. See *generally* United States Postal Service Request for Semi-Permanent Exception from Periodic Reporting of Service Performance Measurement or, in the Alternative, Petition for Rulemaking Concerning 39 C.F.R. § 3055.45(a), Docket No. RM2011-4, November 23, 2010.

The Postal Service has already explained, however, that product-level data are only available for 40 percent of Standard Mail letters and 18 percent of Standard Mail flats, and that these data are too scant to be reliable or to give rise to fair public expectations of actual service performance.<sup>20</sup> As strenuously as the Public Representative laments the perceived delay in the Postal Service's request, neither of the Public Representative's proposals would avert the need for a temporary waiver from product-specific reporting in the interim.

### **iii. Applicability of Data Threshold**

The Postal Service has proposed to begin reporting product-level Standard Mail performance data when at least 80 percent of the available documentation data for Full Service Intelligent Mail barcoded Standard Mail has product-level information to enable reporting compliant with the Commission's rules.<sup>21</sup> PostCom/DMA asks whether that threshold applies at the class level. PostCom/DMA would prefer that the threshold apply at a reporting-category level and envisions a scenario where individual Standard Mail reporting categories come online in phases.<sup>22</sup>

The 80 percent threshold applies across all Standard Mail using the relevant documentation. The very issue is that individual reporting categories cannot currently be distinguished within a range record, and so there is no way to tell when an individual

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<sup>20</sup> CHIR1 Response at 16, 17-18.

<sup>21</sup> PostCom/DMA claims that it is "unclear now" whether the Postal Service's request proposes to begin reporting in 2012 or when the 80 percent threshold has been crossed. PostCom/DMA Comments at 20. The answer is the latter: by presenting timetables aimed at 2012, the Postal Service only meant to indicate the soonest time at which it expected the requisite information might be available for reporting, depending on the pace of mailer adoption. Put another way, the Postal Service is prepared to provide product-level reports in 2012 so long as mailers are diligent and prompt in their provision of enough usable product-level data.

<sup>22</sup> *Id.*

product category, in isolation, reaches the 80 percent threshold.<sup>23</sup> On the other hand, an 80 percent threshold across all applicable Standard Mail would actually be less strict and allow reporting sooner than PostCom/DMA's proposal: once the availability of product-level data reaches 80 percent across all documentation, the data availability within individual product categories might be lower than 80 percent, yet the Postal Service would begin to report these data anyway. In any event, the purpose of the threshold is not so much to establish a positive standard for reporting individual categories, but rather to reduce the amount of mail being excluded from measurement.

### **B. Standard Mail Non-Flat Machinables (NFM)s/Parcels**

PostCom/DMA and PSA take issue with the Postal Service's request for a temporary waiver for the portion of Standard Mail NFM)s/Parcels that would remain on the market dominant products list based on the Postal Service's request to transfer commercial Standard Mail parcels to the competitive products list.<sup>24</sup> Of course, the Postal Service's request is contingent on the outcome of Docket No. MC2010-36. If the Postal Service's request in Docket No. MC2010-36 is denied, the Postal Service may need to reevaluate whether its original service measurement plans for Standard Mail NFM)s/Parcels are still viable, or whether an additional temporary waiver or methodology change might be necessary. PostCom/DMA and PSA are wrong, however, to castigate the Postal Service for its proactive attempt to initiate 39 C.F.R. § 3055.6 compliance

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<sup>23</sup> The task is further complicated by the fact that some product categories cross shape lines: Carrier Route includes letters, flats, and parcels, for instance, and High Density and Saturation flats and parcels are grouped together.

<sup>24</sup> PostCom/DMA Comments at 14; PSA Comments at 2.

through a proposal that describes the effect of the potential product change on service performance reporting.<sup>25</sup>

### **C. Enterprise Data Warehouse (EDW)**

PostCom/DMA and PSA point to data from the Postal Service's EDW that were included in a Mailers' Technical Advisory Committee (MTAC) report and tout those data as a handy, existing source for performance reporting.<sup>26</sup> This solution is overly facile, however. The Parcel Summary EDW reports cited by PostCom/DMA and PSA apply to Parcel Select only, which is a competitive product. Software changes would have been required to incorporate market dominant products in the report. Since the MTAC document cited by PSA, however, the Parcel Summary reports have been programmatically discontinued and are no longer in use. When in use, these reports served different purposes and used different business rules than the data intended to be reported to the Commission. The Parcel Summary reports and data ultimately proved to be insufficient for even the Postal Service's internal diagnostic purposes. Therefore, even if the EDW Parcel Summary reports were still in effect and applied to market dominant products, the Postal Service does not believe the data would be sufficiently reliable for public reporting, on which basis the Commission and interested public would build their expectations and purport to assess actual performance.

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<sup>25</sup> Although the Postal Service disagrees with the Public Representative's characterization of the procedural history of Stamp Fulfillment Services, the Public Representative implies that the Postal Service would be best served by diligent, preemptive attention to the service performance implications of pending product changes. PR Comments at 20 fn.15. Coincidentally, this is just what the Postal Service is attempting to exercise for Standard Mail NFMs/Parcels.

<sup>26</sup> *Id.* at 16; PSA Comments at 2-3.

### III. Complaints of Delay

PSA and Valpak allude to the length of time that has passed since the enactment of the statutes on which the Commission's service performance reporting rules rest.<sup>27</sup> These allusions could be read to suggest that perceived Postal Service dilatoriness is somehow responsible for the pace of implementation thus far and for any further delay in reporting at the levels now required by the Commission's rules. This suggestion would be erroneous and unfair, however. The Postal Service wishes to remind parties that the Postal Service has been fully committed to implementing measurement and reporting as set forth in its June 2008 Service Performance Measurement Plan. The Postal Service undertook significant efforts to prepare its systems for implementation. Not until two years later – this past May – did the Commission issue its final reporting rules, which require reporting at far more discrete and disaggregated levels than the Postal Service had planned.<sup>28</sup>

The Postal Service's comments in Docket No. RM2009-11 pointed out this discrepancy to the Commission and advised of the difficulties this would cause for implementation, yet the ultimate outcome was not clear until the Commission's final rule

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<sup>27</sup> PSA Comments at 2; Valpak Comments at 2. See also PostCom/DMA Comments at 10-11 (complaining that the Postal Service continues to identify and work through significant issues with the Full-Service Intelligent Mail barcode system 18 months after implementation).

<sup>28</sup> To its credit, Valpak at least includes a reference to the timing of the Commission's Order No. 465. Valpak Comments at 2. For all that PSA and Valpak cite the enactment of the Postal Accountability and Enhancement Act of 2006, nothing in that act's annual reporting provisions can be construed as clearly foreshadowing the Commission's discretionary decision to require disaggregated and quarterly reporting. See PRC Order No. 465, Order Establishing Final Rules Concerning Periodic Reporting of Service Performance Measurements and Customer Satisfaction, Docket No. RM2009-11, May 25, 2010, at 10-11, 15-16 (claiming that detailed quarterly reporting is necessary, not to fulfill an express statutory mandate as for annual reporting, but to serve more general regulatory purposes related to monitoring quality of service). It is thus misleading for the mailing industry commenters to exaggerate their hand-wringing by hearkening back to the statute, rather than to the Commission's more stringent and problematic Order No. 465.

in Order No. 465.<sup>29</sup> Obviously, the Postal Service cannot be faulted for declining to initiate far-reaching and burdensome systems changes on the mere basis of a proposed rule, nor for waiting to see whether the Commission would indeed enact such requirements in spite of the Postal Service's concerns. Since that Order, the Postal Service has been working diligently to change its systems where necessary to develop product-specific data and more reliable statistics and fulfill the Commission's new reporting rules, as evidenced by its submissions in this proceeding. The relevant starting point for evaluating the nature and timing of any implementation steps resulting from Order No. 465's requirements is therefore May 25, 2010, and not the 2006 enactment of the Postal Accountability and Enhancement Act, the 2008 filing of the Postal Service's measurement plan, or even the 2009 roll-out of the Full Service Intelligent Mail barcode. To suggest otherwise, as the mailing industry commenters appear to do, disingenuously diminishes the Postal Service's efforts over the last several years to achieve timely, comprehensive, and customer-responsive compliance with the new statutory obligations, pending the eventual issuance of the Commission's granular reporting requirements.

As PostCom/DMA recognizes, service performance measurement and reporting are "an evolutionary process."<sup>30</sup> As reflected more generally by PostCom/DMA's comments, part of that evolution involves the Postal Service's relationship with business mailers and all parties' expectations for cooperation. Some of the processes that the Postal Service had initially expected to employ, such as the association of mailing

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<sup>29</sup> United States Postal Service Comments in Response to Order No. 292, Docket No. RM2009-11, November 2, 2009, at 15-16 (explaining that, while the Postal Service had proposed quarterly reporting at the class level in its 2008 measurement plan, a requirement for quarterly reporting at the product level "fundamentally changes the calculus" and "dramatically increases the burden on the Postal Service").

<sup>30</sup> PostCom/DMA Comments at 22.

documentation with FAST appointments, has been sidetracked by mailers' inability or unwillingness to cooperate. To be sure, this reluctance is understandable in light of the dire economic conditions that have prevailed since shortly after the Postal Service's June 2008 Service Performance Measurement plan: cash-strapped businesses may not be as willing as they once were to invest in software and process modifications for the sake of better service performance data. Rather than demonstrating a lack of cooperation with the mailing industry, as PostCom/DMA believes, any complained-of "delay" in implementation of service performance measurement and reporting to date has, in some part, been a *function of* the Postal Service's efforts to adapt to changing mailer demands and capabilities.

#### **IV. Other Comments**

Echoing a question by its counsel at the November 17, 2010, technical conference, Valpak seeks confirmation that the Postal Service would provide variance reports in accordance with Order No. 465 notwithstanding any temporary waivers.<sup>31</sup> To the extent that the Postal Service's response at the technical conference may have given this impression, the Postal Service wishes to clarify that its ability to provide service variance data is on par with its ability to provide any other performance data. Therefore, the Postal Service's request for temporary waivers should be understood to apply, where pertinent, to variance reporting as well. The Postal Service regrets any confusion that may have ensued on this point.

PostCom/DMA uses its comments to suggest agenda items for a hypothetical conference with the Postal Service and the Commission, criticize Postal Service's organizational focus, advocate for future external audits of the Postal Service, and ask

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<sup>31</sup> Valpak Comments at 2.

the Commission to make the Postal Service publish afresh the business rules for service performance measurement.<sup>32</sup> Needless to say, none of these points is the proper subject of a proceeding about whether to grant temporary waivers from the Postal Service's performance reporting for specific products, and they should play no role in the Commission's decision on the Postal Service's temporary waiver request.

## **V. Conclusion**

The Postal Service respectfully submits the above comments for the Commission's consideration. While certain alternatives may have merit, they may pose their own difficulties and would not avert the need for relief from reporting obligations in the meantime. Other alternatives do not withstand scrutiny. All in all, the Postal Service hopes that these comments help to further clarify its request.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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<sup>32</sup> PostCom/DMA Comments at 5-6, 8-12.