

Before the  
POSTAL REGULATORY COMMISSION  
WASHINGTON, DC 20268-0001

Notice of Market Dominant Price  
Adjustment for First-Class Mail  
and Standard Mail

Docket No. R2011-5

PUBLIC REPRESENTATIVE MOTION FOR  
ISSUANCE OF INFORMATION REQUEST

(April 19, 2011)

The Public Representative hereby files this motion, pursuant to Rule 3001.21(a), requesting issuance of a Commission Information Request (CIR) to obtain information necessary to fully understand the factual bases relied upon by the Postal Service in support of its United States Postal Service Notice of Market-Dominant Price Adjustment, April 12, 2011 (Notice). The Commission has previously recognized that participants, including the Public Representative, may indentify issues for Commission consideration that should be raised in a formal request, such as a CIR.<sup>1</sup> Therefore, the Public Representative requests 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. In the 2010 Annual Compliance Determination (ACD) the Commission directed the Postal Service to “increase the cost coverage of the Standard Mail Flats products” through above average price increases and cost reductions. ACD 2010 at 106. Please explain how the proposed three percent discount, which is available for Standard Mail Flats, is consistent with the Commission’s directive described above.
2. The Postal Service states “this program will be excluded from First-Class Mail and Standard Mail price-cap calculations pursuant to the procedures described in Rule 3010.24.” Notice at 3. 39 CFR 3010.24 concerns treatment of volumes associated with negotiated service agreements in price

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<sup>1</sup> See Docket No. R2010-4, POIR No. 5, August 18, 2010.

- cap calculations. However, negotiated service agreements and/or special classifications are reviewed by the Commission pursuant to 39 CFR 3010 Subpart D. Please explain how the proposed price adjustment complies with 39 CFR 3010 Subpart D, and provide all necessary supporting workpapers.
3. Please provide an estimate of the impact the proposed price adjustment will have on each eligible product's contribution to institutional costs.
  4. The Postal Service states, "[t]his program will not impact current workshare discounts." Notice at 8. Please provide an analysis that demonstrates the claim that there will be no impact on workshare discounts.
  5. The following questions concern the two-dimensional barcode (barcode).
    - a. Please confirm that mailers are not currently precluded from placing a barcode inside or on a mailpiece.
    - b. Please explain how the Postal Service will ensure that the barcode is not used for internal operational process, or postage evidencing. See Notice at 3. For example, will the mailer be required to provide a certification?
    - c. Please explain how the Postal Service will verify that a barcode is inside a mailpiece. For example, will the mailer be required to provide a certification?
  6. Please explain the rationale for excluding nonprofit mail from the program.

Respectfully submitted,

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