

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

RETAIL ACCESS OPTIMIZATION
INITIATIVE, 2011

DOCKET NO. N2011-1

DAVID B. POPKIN MOTION NUMBER 12

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Respectfully submitted,

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On September 9, 2011, the Postal Service filed the Errata Notice to cover the Notice that was filed on August 30, 2011, to cover the application for non-public treatment of USPS Library Reference N2011-1/NP4. The Errata Notice states that the application is attached to the Errata Notice. The Commission's Daily Document Listing shows this Postal Service filing as a single PDF file [LR8-NP4 Notice [ERRATA].pdf] which when opened only provides a two-page Errata Notice and does not contain the attachment as referred to in the Errata Notice.

On September 12, 2011, the Postal Service refiled its Errata Notice with the Application for non-public treatment of materials. This Application relates to facility finance numbers as well as Post Office Box usage data.

The Postal Service states that revealing box usage at competitive locations would enable competitors to focus marketing efforts on particular Postal Service locations where there are many potential customers for the competitor. The Postal Service considers it highly probable that, **IF** [emphasis supplied] this information were made public, the Postal Service's competitors would take immediate advantage of it. ¹

¹ Application at 3

Well the IF has now been replaced by SINCE. This information has been made public even to the extent that it appears on the Postal Service's own website.

The Postal Service has established a new service EVERY DOOR DIRECT MAIL. In order to determine the number of mail pieces required to serve all of the PO Box holders at a given facility, the Postal Service has established a website at the following URL:

<https://eddm.usps.com/eddm/appLoaded.cfm>

Similar data is also available at the Melissadata website at the following URL:

<http://www.melissadata.com/lookups/cartzip.asp>

In the past the Postal Service provided hard copies of similar data in their Carrier Route Information Service [CRIS] data. Since a fee was established for this data, I do not know if it is still available.

Furthermore, it should be noted that the number of Post Office Boxes in use has been declared public information by the Commission in Order Number 783 on July 29, 2011, in Docket Number A2011-18.

Since this information was relevant to be provided by the Postal Service for examination under seal, it is now equally relevant to the evaluation of the Postal Service's request. I do not see why I should have to file a request to see information that has already been made public by the Postal Service as well as the necessity of the conditions imposed by the under seal filing.

Based on the above, the Commission should order the Postal Service to submit a revised Library Reference which does not redact the number of Post Office Box holders.

