



July 29, 2011

Hon. Shoshana M. Grove, Secretary
Postal Regulatory Commission
901 New York Avenue NW, Suite 200
Washington, DC 20268-0001

Dear Ms. Grove:

With this letter, the Postal Service transmits to the Postal Regulatory Commission (Commission) an advance courtesy copy of a draft final rule that would establish a service standard for Stamp Fulfillment Services (SFS) and draft measurement system plan, containing its proposed data reporting elements and methodologies. The Commission added SFS to the market-dominant product list in Order No. 487, Order Accepting Product Descriptions and Approving Addition of Stamp Fulfillment Services to the Mail Classification Schedule Product Lists, Docket No. MC2009-19 (July 13, 2010), two and a half years after the Postal Service established modern service standards for market-dominant products pursuant to 39 U.S.C. § 3691. 72 Fed. Reg. 72216-31 (December 19, 2007). As discussed in Docket No. RM2011-1, the Postal Service now seeks to begin the process for establishing service standards and a measurement system for SFS.

In Order No. 745, the Commission directed the Postal Service to either file a request for a semi-permanent exception from reporting service performance for SFS or begin the consultation process for establishing service standards. The Postal Service questions whether advance consultation is required by 39 U.S.C. § 3691, as it believes that the Commission's consultative role was intended to apply to the initial establishment of service standards, adopted at 72 Fed. Reg. 72216 (December 19, 2007) (to be codified at 39 C.F.R. parts 121 and 122). Nevertheless, in the interest of comity, the Postal Service is providing the Commission with an advance copy of its draft final rule before it is published in the *Federal Register*. The Postal Service is also providing its proposed measurement system plan in conjunction with this communication.

The Postal Service welcomes any input from the Commission that might further inform the draft final rule or proposed measurement system plan. The Postal Service currently plans to submit the draft *Federal Register* notice to the Federal Register within the next two weeks, so we would be grateful to receive any feedback that the Commission may have in that timeframe.

Thank you for your consideration regarding this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'KAC', with a long horizontal flourish extending to the right.

Kevin A. Calamoneri
Managing Counsel
Corporate & Postal Business Law

Enclosures