

DOCKET SECTION

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April 20, 1998

Hon. Margaret P. Crenshaw  
Secretary  
Postal Rate Commission  
1333 H Street, N.W., Suite 300  
Washington, D.C. 20268-0001

**Re: Postal Rate and Fee Changes, 1997**  
**Docket No. R97-1**

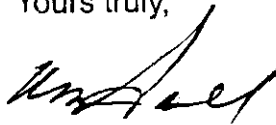
Dear Ms. Crenshaw:

Enclosed for filing with the Commission in the referenced proceeding are an original and twenty-four (24) copies of a revised page 3 of the April 10, 1998 Memorandum Reply Brief of The Brooklyn Union Gas Company On Prepaid Reply Mail. This page has been revised to correct a factual misstatement -- that certain parties intervened after the formal evidentiary record closed -- and to eliminate the inadvertent and inaccurate suggestion that the prior actions of those parties and other CRM mailers were "secretive". Simultaneously, three (3) copies are being served upon Ms. W. Gail Willette, the Designated Officer of the Commission in this proceeding, and six (6) copies are being served upon the United States Postal Service.

Please acknowledge receipt of the enclosures by date stamping and returning the designated copy to our messenger.

Thank you for your cooperation in this matter.

Yours truly,



Michael W. Hall

Enclosures

Brooklyn Union has received initial briefs in support of PRM from the Postal Service, the American Postal Workers Union ("APW") and the Magazine Publishers Association ("MPA"). The OCA has not opposed approval of PRM but the OCA does believe its own CEM proposal is somehow "superior" to PRM.

Only the Coalition of CRM Mailers ("CRM Coalition"), a thirteenth-hour group composed in large part of parties who only sought intervention in these proceedings *after* the rebuttal hearings closed, has requested the Commission to "defer action on PRM and direct the Service to form a task force to examine sensible alternatives to the present PRM proposal."<sup>1</sup> Brooklyn Union takes strong exception to the CRM Coalition's tactics. Many of the mailers and organizations that now comprise the CRM Coalition originally eschewed direct participation in this proceeding where all issues regarding the PRM proposal could be addressed in an open and procedurally fair manner. Instead, they urged the Board of Governors to order the Postal Service to withdraw the PRM proposal in this proceeding. Only when their tactics failed did these mailers belatedly intervene in this proceeding for the purpose of reorganizing themselves as the CRM Coalition and participating openly in this case.

For the following reasons, the belated objections to PRM are based on fundamental misperceptions of the Postal Service's PRM program and/or a prejudiced and wholly erroneous view of the scope and purposes of the instant proceedings.

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<sup>1</sup> Coalition IB at 1.

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with Section 12 of the Rules of Practice.

Dated at Washington, D.C., this 20th day of April, 1998.



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