

ORIGINAL

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

001347

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

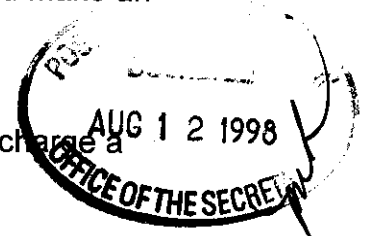
Mailing Online Service)
)
)

Docket No. MC98-1

ACCUDOCS L.L.C.'S
STATEMENT OF ISSUES

AccuDocs L.L.C. believes that the issues in this proceeding should include the following:

1. Is it appropriate to process the Service's Request under the Commission's rules allowing expedited action for market tests (39 CFR §§ 3001.161-166) and experimental services (39 CFR §§ 3001.67-67d)?
2. What is the proper test year for determine the economics of the proposed service?
3. What are the expected volumes and revenues for the proposed service?
4. What is the expected rate of growth and market penetration of the proposed service?
 - A. What are the expected elasticity and volume changes of the proposed service at proposed rates?
5. What are proper rates and classifications for the proposed service?
6. What is the proper calculation of attributable costs of the proposed service, and do the proposed rates recover those costs and make an adequate contribution to institutional costs?
7. If a market test is permitted, is it proper for the Service to charge a



production-and-premailing fee of unit contract cost multiplied by a factor of 125 percent?

8. If an experimental service is permitted, is it proper for the Service to charge a production-and premailing fee calculated by multiplying the sum of printer contractual costs by 125 percent plus 0.1 cent per impression?

9. What is the expected effect of the proposed service on First-Class Mail rates?

10. What will be the effect of the proposed service on "firms offering services competitive with or alternative to the service offering[] of the Postal Service" (39 CFR §3001.67(b)(2))?

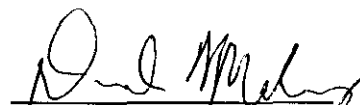
11 Is the proposed service anticompetitive?

12. Does the proposed service comply with the standards of Section 3622(b)(5) insofar as it affects enterprises in the private sector of the economy that are engaged in alternative means of delivering letters?

13. Does the proposed service comply with the "fair and equitable" standards of Sections 3622(b)(1) and 3623(c)(1) ?

14. Does the proposed service violate Section 403(c)'s prohibition against making "any undue or unreasonable discrimination among users of the mail" or granting "any undue or unreasonable preferences to any such user"?

Respectfully submitted,

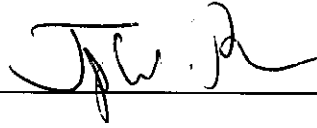

for AccuDocs, L.L.C.

August , 1998

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document, by First-Class Mail, upon the United States Postal Service, , the Office of Consumer Advocate, and other participants listed of record.

A handwritten signature in black ink, appearing to read "J.P.", is written above a horizontal line.

August , 1998

Jeffrey Plummer