

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

COMPETITIVE PRODUCT LIST

Docket No. MC 2013-57

ADDING ROUND-TRIP MAILER

COMMENTS OF MMAVAULT IN RESPONSE TO COMMISSION ORDER NO. 1794

Pursuant to Order No. 1794, MMAVault respectfully submits these comments on the Request of the Postal Service Under Section 3642 to Create Round-Trip Mailer Product.

MMA Vault is a small business that relies on the Postal Service to process, deliver, and return DVD Mailers. MMA Vault has been using the Postal Service exclusively to deliver DVDs since ^xxxx^. MMA Vault has dealt with many of the issues detailed by GameFly in C2009-1. DVDs break when processed on Letter Automation Equipment. As with GameFly, MMAVault has taken significant steps to prevent breakage. Due to the unwillingness of the Postal Service to provide MMAVault manual processing of DVD mailers, MMAVault has been forced to mail DVDs at two-ounce flat rates.

The remedy outlined in Order No. 1763 will rectify long-running discrimination against DVD mailers smaller than Netflix. MMAVault supports the approach outlined by the Commission to remedy this long running discrimination. While MMAVault supports the prices described by the Postal Service, MMAVault cannot support the classification of the DVD Round Trip Mailer as Competitive because the Postal Service maintains monopoly pricing power on the delivery of DVDs and has a history of discriminatory abuse of this pricing power.

Round-Trip DVD Mailers deserve the protection from rapid increases in rates provided by the CPI cap. Implementing Letter prices for all DVD mailers that level the playing field will allow MMAVault to expanding, increasing Postal Service volume.

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