

PUBLIC (REDACTED) VERSION

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Competitive Product Prices
Priority Mail
Priority Mail Contract 73

Docket No. MC2014-11

Competitive Product Prices
Priority Mail Contract 73 (MC2014-11)
Negotiated Service Agreement

Docket No. CP2014-15

PUBLIC REPRESENTATIVE COMMENTS ON
POSTAL SERVICE REQUEST TO ADD
PRIORITY MAIL CONTRACT 73
TO COMPETITIVE PRODUCT LIST

(January 2, 2014)

The Public Representative hereby provides comments pursuant to Order No. 1918.¹ In that Order, the Commission established the above referenced docket to receive comments from interested persons, including the undersigned Public Representative, on a Postal Service Request to add Priority Mail Contract #73 to the competitive product list.² In support of its request, the Postal Service filed an application for non-public treatment of materials to maintain redacted portions of the contract and related financial information under seal. Because the PR's comments contain contract and financial model detail the Postal Service has filed under seal, the PR has filed a redacted and nonpublic version of her comments.³

Requirements of 39 U.S.C. § 3633. Pursuant to 39 U.S.C. § 3633(a), the Postal Service's rates for competitive products must not result in the subsidization of

¹ Notice and Order Concerning the Addition of Priority Mail Contract 73 to the Competitive Product List, December 20, 2013 (Order No. 1918).

² Request of the United States Postal Service to Add Priority Mail Contract 73 to Competitive Product List and Notice of Filing (Under Seal) of Unredacted Governors' Decision, Contract, and Supporting Data, December 19, 2013 (Request).

³ Notice of the Public Representative of Filing of Materials Under Seal, January 2, 2014.

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PR Comments

SUMMARY

The PR does not believe Priority Mail Contract #73 should be added to the competitive contract list until the contract terms are worded with more certainty¹⁵ so that the financial model assumptions [REDACTED]

[REDACTED] are not inadvertently violated, by [REDACTED]
[REDACTED]

As shown by the PR, possible variation [REDACTED]
[REDACTED]
[REDACTED].¹⁶ The PR believes the current contract wording, [REDACTED] [REDACTED]
[REDACTED] could result in the proposed revenues, not covering their projected attributable costs.

The Public Representative respectfully submits the foregoing comments for the Commission's consideration.

Respectfully Submitted,

/s/ Manon A. Boudreault

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¹⁵ For example, [REDACTED]
[REDACTED]
[REDACTED]
The PR believes it prudent [REDACTED]
[REDACTED]
[REDACTED].

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PR Comments