

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

Notice of Market-Dominant  
Price Adjustment

Docket No. R2015-4

**PARCEL SHIPPERS ASSOCIATION  
MOTION FOR ISSUANCE OF INFORMATION REQUEST  
(January 30, 2015)**

Parcel Shippers Association (PSA) pursuant to Rule 3001.21(a), hereby moves the Commission to issue an Information Request seeking an explanation from the Postal Service concerning the availability of the Bulk Parcel Return Service (BPRS).

The USPS Notice of Market-Dominant Price Adjustment (at 53-54) states that, along with the price adjustment, classification language will be revised to, among other changes, "[e]liminate permit and account maintenance fees for Bulk Parcel Return Service, because its customers always have outbound Postal Service volume. Correct MCS language to include Parcel Select Lightweight as qualifying for Bulk Parcel Return Service." PSA supports these changes.

However, the USPS Notice (at 54) describes another classification change – "[r]ename Shipper-Paid Forwarding as Shipper-Paid Forwarding/Return, and correct description to identify Standard Post as qualifying product, and eliminate Bulk Parcel Return Service as available return price" – that appears to eliminate the BPRS product as a return option for Parcel Select Lightweight packages. Such a change, if implemented, would cause returns currently paying BPRS rates to migrate to much higher First-Class Mail or Priority Mail rates.<sup>1</sup> PSA strongly opposes such a change.

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<sup>1</sup> This change would be implemented in proposed section 1505.16.1.b of the MCS: "[i]f Shipper-Paid Forwarding/Return service is elected for a parcel that is returned, the permit holder will pay the applicable First-Class Mail or Priority Mail price, ~~or the Bulk Parcel Return Service price, if that service was elected.~~" USPS Notice, Attachment A, Part II, Page 112.

Given the importance of BPRS to many shippers of Parcel Select Lightweight, PSA requests that the Commission ask the Postal Service to confirm that Parcel Select Lightweight packages with the BPRS endorsement continue to be eligible for BPRS return prices under Shipper-Paid Forwarding/Return services once the proposed prices and classification language are implemented on April 26.

### **Proposed Question**

1. Please confirm that Parcel Select Lightweight packages with the Bulk Parcel Return Service (BPRS) endorsement will continue to be eligible for BPRS return prices under Shipper-Paid Forwarding/Return services once the proposed prices and classification changes are implemented on April 26. If your response is anything other than an unqualified confirmation, please explain fully and provide citations to where the rate increase resulting from the elimination of the BPRS option for these packages is accounted for in your price cap compliance calculations.

Respectfully submitted,

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