

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

COMPETITIVE PRODUCTS PRICE CHANGES
RATES OF GENERAL APPLICABILITY

Docket No. CP2016--9

COMMENTS AND MOTION FOR RECONSIDERATION OF DAVID B. POPKIN

On October 16, 2015, the United States Postal Service filed its Notice in this Docket. Two of the major Competitive services that changes being proposed were Priority Mail Express and Priority Mail. There are three categories of Priority Mail rates – Retail, Commercial, and Commercial Plus¹. As an individual small mailer, I am able to use either the Retail Rate or the Commercial Rate. In order to use the Commercial Rate, I am required to use specifically authorized postage payment methods. This requirement is shown in Section 2110.4 of the Mail Classification Schedule [“MCS”].

- Commercial Base – Available to mailers who use specifically authorized postage payment methods
 - o Zone/Weight – Prices are based on weight and zone
 - o Flat Rate Envelopes – Envelope provided or approved by the Postal Service
 - o Flat Rate Boxes – Boxes provided or approved by the Postal Service
 - o Regional Rate Boxes
 - o Balloon Price – Applies to parcels in zones local through 4, weighing less than 20 pounds, and measuring between 84 and 108 inches in combined length and girth
 - o Dimensional Weight – Applies to parcels in zones 5 through 8 that exceed one cubic foot

¹ Commercial Plus rates require 5,000 or more pieces mailed annually. The Postal Service plans to eliminate this rate in 2017.

As an individual small mailer, the primary method that I would have to meet the requirement to utilize a specifically authorized postage payment method would be the USPS Click-N-Ship. This only requires the use of a personal computer to print the address label and a credit or debit card to cover the cost of the postage. It also allows for the identity of the mailer to cover the aviation security requirements if the mail piece is over 13 ounces.

The changes authorized by the Commission's approval of the Postal Service Notice in Docket CP2016-9 appeared in the December 10, 2016 issue of the Postal Bulletin.

Other

USPS Click-N-Ship

The Postal Service is restructuring USPS Click-N-Ship® to offer only retail prices. USPS Click-N-Ship will no longer be an authorized payment method for Priority Mail Express Commercial Base® pricing and Priority Mail Commercial Base pricing.

This change in the postal regulations will virtually eliminate the ability for the small individual mailer to utilize the Commercial Rates after January 17, 2016. The effect of this change is very significant, For example, last month I sent a 13 pound Priority Mail package with a length plus girth of over 84 inches to New York City [Local Zone 1 and 2] for \$10.26 Commercial Rate of 20 pounds Balloon rate. Had I mailed this same parcel after the January 17, 2016 rate change it would be \$18.50 Retail Rate or an increase of over 80 percent.²

² Without the change in the use of Click-N-Ship for postage, the cost for the parcel would have only changed by 5% - \$10.77 up from \$10.26.

This is a very significant price increase to a well utilized service and the failure of the Postal Service to include this change in its required Notice to the Commission did not allow the Commission to evaluate the effect of the increase and the members of the public to comment on the effect to them and makes the Notice incomplete.

I request that the Commission reconsider its approval of the wording in MCS Section 2110.4

Respectfully submitted,

David B. Popkin

Post Office Box 528

Englewood NJ 07631-0528

201-569-2212