



Proposed DMM section 508.4.6.3(b)(3) states, in part, that eligibility for Group E post office boxes does not extend to “locations where....other conditions preclude extension of carrier delivery.” It appears that the term “other conditions” was designed to be a catch-all provision. The Postal Regulatory Commission is concerned with the potential consequences of the proposed undefined catch-all. This provision could significantly limit affected individuals’ eligibility for Group E post office boxes.

The Postal Regulatory Commission’s 2008 Report on Universal Postal Service and the Postal Monopoly addressed the importance of Group E post office boxes.<sup>1</sup> The USO Report noted that in a previous Mail Classification case, the Postal Rate Commission found it inequitable for the Postal Service to deny free post office boxes to non-city mail recipients that were ineligible for carrier delivery, when city recipients were provided free delivery. As a result, the Postal Service agreed to provide free post office boxes to those customers ineligible for carrier service.

Proposed DMM section 508.4.6.3(b)(3) raises similar issues. As proposed, it provides local postal managers with discretion regarding the application of this catch-all provision, which could lead to inconsistent application within the United States. Individuals in some parts of the country might be ineligible for Group E post office boxes while their counterparts in other areas would be eligible depending on how local officials define “other conditions.” Such decisions would thereby impact fulfillment of the Postal Service’s Universal Service Obligation with respect to the delivery of mail.

Accordingly, the Postal Regulatory Commission urges the Postal Service to eliminate the “other conditions” clause from proposed DMM section 508.4.6.3(b)(3).

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<sup>1</sup> Report on Universal Postal Service and the Postal Monopoly (December 19, 2008) at 76-77 *citing* Postal Rate Commission Opinion MC96-3 (April 2, 1997) (USO Report).

Respectfully Submitted,

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