

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, DC 20268-0001

MODIFICATION OF MAIL CLASSIFICATION  
SCHEDULE PRODUCT LISTS REGARDING  
PREMIUM FORWARDING SERVICE

DOCKET NO. MC2008-4

REPLY COMMENTS OF DAVID B. POPKIN

June 23, 2008

Respectfully submitted,

PRCmc20084replyCOMMENTS

DAVID B. POPKIN, POST OFFICE BOX 528, ENGLEWOOD, NJ 07631-0528

---

---

On June 20, 2008 the Postal Service filed Reply Comments in this Docket. The following Paragraph appears on Page 3 [footnotes have been removed].

The filing of comments in this docket by the National Association of Retail Shipping Centers (NARSC), an advocacy group on behalf of Mail and Parcel Centers and Commercial Mail Receiving Agencies, belies the Public Representative's doubt regarding the existence of "alternative substitute products." NARSC maintains that it has a "vested interest" in this competitive market because its members provide mail forwarding services. It expresses support for setting PFS fees based on a "floor price," presumably as opposed to being subject to a price cap. Clearly, NARSC is of the opinion that its members provide services that are competitive alternatives to PFS, contrary to the claim of the Public Representative that CMRAs "could not be significant competitors for the PFS market."

The Postal Service in the last sentence of the paragraph claims that NARSC members provide competitive alternatives to PFS. I looked at the NARSC comments that were filed on June 16, 2008, and they provide a website for the organization - [www.narscinfo.com](http://www.narscinfo.com). Utilizing this website and conducting a number of 100 mile radius

searches<sup>1</sup> in their store locator option indicated the following members in the Northeast United States:

MAINE	None
NEW HAMPSHIRE	Nashua, Milford, Manchester
VERMONT	None
MASSACHUSETTS	Arlington, Millis, Franklin, Marshfield
RHODE ISLAND	None
CONNECTICUT	Manchester, Southbury
NEW YORK	Larchmont
NEW JERSEY	None
PENNSYLVANIA	Clarks Summit
MARYLAND	Baltimore, Frederick
DELAWARE	None
DISTRICT OF COLUMBIA	None

Having a total of only 13 member store locations in the Northeast United States [11 states plus DC] is far from a meaningful competitive alternate to PFS.

---

The following Paragraph also appears on Page 3.

The Postal Service also respectfully refers the Commission's attention to recent testimony at its field hearings in Flagstaff, Arizona, by Cameron Powell, vice president for strategic development at Earth Class Mail in Seattle, Washington, and avowed "road warrior."<sup>9</sup> Earth Class Mail provides electronic and physical mail forwarding and its website quotes customers who appear to be within the target market for PFS.<sup>10</sup>

<sup>9</sup> Docket No. PI-2008-3, Transcript of Flagstaff Field Hearing at 57.

<sup>10</sup> "We're snowbirds, so the problem we had when we were moving around is that USPS couldn't deliver mail to us unless we were staying at only one location.' The

---

<sup>1</sup> Searches were made using the following ZIP Codes along with a 100 mile radius:  
02215, 02840, 04101, 04401, 04652, 05819, 06098, 06415, 07631, 08401, 12201, 13201, 13676, 14201, 15201, 16601, 17101, 17701, 19104, 19711, 20001

Neumans.” The website indicates that the base cost for its service is \$9.95 per month. <http://www.earthclassmail.com/pricing>.

The Postal Service fails to explain what services the customer will receive for the base price of \$9.95 per month.

- A. The \$9.95 Essential option requires a 12 month subscription. A one month subscription is \$13.95.
- B. There is a one-time setup fee of \$25.00.
- C. There are options with a base monthly fee of as much as \$69.95.
- D. The Essential option only provides for 35 mail pieces per month. Extra mail pieces are 30¢ each.
- E. The Essential option only provides for 50 pages scanned per month. Extra pages scanned are 50¢ per envelope and 25¢ per page.
- F. Only one individual recipient is provided. Additional recipients are \$3 each.
- G. Use of street addresses can add \$4.95 to \$24.95 per month.
- H. Forwarding mail requires an added charge.

---

As noted in my original Comments, these services and other CMRAs require that customers have their mail already being sent to the CMRA address. If the mail is being delivered by the Postal Service, the CMRA will not work.

The Postal Service has failed to demonstrate a meaningful level of competition for its Premium Forwarding Service.