

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

RATE AND SERVICE CHANGES TO IMPLEMENT  
BASELINE NEGOTIATED SERVICE AGREEMENT  
WITH BOOKSPAN

Docket No. MC2005-3

REQUEST OF THE UNITED STATES POSTAL SERVICE  
FOR ESTABLISHMENT OF SETTLEMENT PROCEDURES  
(July 14, 2005)

The United States Postal Service hereby requests that the Commission establish settlement procedures for this filing. Pursuant to chapter 36 of title 39, United States Code, the United States Postal Service has determined that it would be in the public interest, and in accordance with the policies and applicable criteria of that title, to implement the classifications, rates and fees contained in the Negotiated Service Agreement (NSA) with Bookspan, which is attached to the request in this case.

The Postal Service believes that there is a distinct possibility of settlement in this case. The relatively straightforward nature of the Bookspan NSA should result in an expeditious and uncomplicated review. Even though it is a new baseline agreement, the substance of the agreement concerns the availability of declining block rates, which are now a well-established feature of NSAs.

Moreover, the agreement is extremely straightforward, and the new features of the agreement are in the nature of risk mitigation and should not be particularly contentious. Naturally, there is room for disagreement over details, and the extent of

any such diverging views can be determined in the course of settlement discussions. Such discussions could facilitate limitation of the issues that need to be litigated, which will aid the Commission in expediting the proceedings, as its rules require.

For these reasons, the Postal Service requests the Commission's assistance in establishing settlement procedures for this proceeding and suggests that a settlement conference be scheduled immediately following the deadline for intervention.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

Scott L. Reiter

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2999, Fax -5402  
July 14, 2005