

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

RATE AND SERVICE CHANGES TO IMPLEMENT  
BASELINE NEGOTIATED SERVICE AGREEMENT  
WITH LIFE LINE SCREENING

Docket No. MC2007-5

UNITED STATES POSTAL SERVICE  
PROPOSAL FOR LIMITATION OF ISSUES  
(August 8, 2007)

The United States Postal Service hereby proposes that the scope of the proceeding be limited to those issues that are unique to the Life Line Screening (“Life Line”) Negotiated Service Agreement. Even though the request is filed as a new baseline agreement, the Postal Service submits that it implicates many issues which are now well-established, and thus need not be re-litigated. In particular, the Life Line NSA has similar components to the Bookspan NSA, which was approved by the Commission in Docket No. MC2005-3. The Life Line NSA features declining block rates for Standard Mail letters, and Life Line exhibits a multiplier effect, all of which is similar to the Bookspan NSA. While Life Line’s multiplier effect does not satisfy the precise language in DMCS § 620.12 for functional equivalence to the Bookspan NSA, because of the extensive similarities between the Life Line NSA and the Bookspan NSA, the Postal Service submits that several issues need not be re-litigated in this docket.

Those issues which have been established in prior dockets include the predominantly legal issues of (1) whether NSAs are consistent with the statutory scheme of the Postal Reorganization Act and, in particular, 39 U.S.C. § 403(c), which

prohibits undue preferences; (2) the finding that an open “niche” classification should not be preferred over an NSA in general; (3) the finding that cost savings are not required for volume-based discount NSAs; and (4) the utility of declining block rates.

The Postal Service submits that the key issues to be addressed in the instant proceeding properly include: (1) the financial impact of the NSA on the Postal Service over the duration of the agreement; (2) the fairness and equity of the NSA in regard to other users of the mail, and (3) the fairness and equity of the NSA in regard to competitors of the parties to the Negotiated Service Agreement.

Accordingly, the Postal Service respectfully requests that the Commission issue an order to the effect that the scope of discovery in this docket will be confined to the above issues.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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August 8, 2007