Facsimile 202-457-6315 www.pattonboggs.com

David C. Todd 202-457-6410 dtodd@pattonboggs.com

Via email

The Honorable James C. Miller III Chairman, Board of Governors US Postal Service 475 L'Enfant Plaza SW Room 10300 Washington DC 20260-1000

Honorable Chairman Miller:

These comments are submitted on behalf of the Mail Order Association of America (MOAA) pursuant to the provisions of 39 CFR Part 9 in response to the Postal Regulatory Commission's Second Opinion and Recommended Decision in Docket No. R2006-1, issued May 25, 2007.

MOAA was a full participant in the above-referenced proceeding before the Postal Regulatory Commission. MOAA supported the position of the Postal Service in the Reconsideration proceeding seeking a \$0.03 per piece reduction in the rates for Standard Mail Regular flats with a corresponding increase of \$0.007 in the rates for Standard Mail letters.

Obviously, MOAA would have preferred Commission acceptance of the Postal Service's proposal, which would have provided longer-term relief to MOAA members as mailers of Standard Mail Regular catalogs without reducing Postal Service revenues. Nevertheless, the Commission's Recommended Decision that the rates for all Standard Mail Regular flats be reduced by 3 cents per piece for a limited period offers significant relief which will encourage additional mail volumes from MOAA members and other mailers. We strongly recommend that the Governors approve of the Commission's Recommended Decision's Recommended Decision.

The Commission also suggested the possibility that the lower rates be implemented in the form of rebates. MOAA believes, however, that adjusting the rate schedules as appropriate would be a much simpler means of implementing the Recommended Decision.



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Finally, MOAA respectfully urges the Governors to act promptly upon the Commission's Recommended Decision and to implement the rate reduction at the earliest possible date to ensure that the reduced rats are in effect for not less than three months.

Sincerely yours,

David C. Todd Counsel to Mail Order Association of America