

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

Amendment to Rules Regarding Rate
Incentives for Market Dominant Products

Docket No. RM2020-5

COMMENTS OF THE NATIONAL POSTAL POLICY COUNCIL
(October 30, 2024)

The National Postal Policy Council respectfully submits these comments in response to Second Supplemental Notice of Proposed Rulemaking in this docket.¹

NPPC has long supported promotional incentives to encourage new approaches and innovations in the use of the mail. Many NPPC members have made use of one or more promotional incentives. They regard the credits that they have earned as a valuable means of partially offsetting the costs of the extra effort required to participate in the promotion, and without the incentives they likely would have mailed fewer pieces.

NPPC commends the Commission for recognizing in its most recently proposed rules that promotional incentives should be available to any mailer and that, when properly structured, should be taken into account in price cap calculations. NPPC also commends the Commission for not allowing the use of

¹ Order No. 7559 (Sept. 20, 2024) (Second Supplemental Notice of Proposed Rulemaking To Amend Rules Regarding Rate Incentives for Market Dominant Products), 89 *Fed. Reg.* 79489 (Sept. 30, 2024).

historical volumes as an eligibility criterion for generally applicable rate incentives.

While NPPC supports the Commission's current proposal, it also encourages the Commission to remain open to treating in a similar manner other promotions or incentives that the Postal Service may devise in the future that encourage volume growth or enhance the value of mail.

The National Postal Policy Council respectfully urges the Commission to take these comments into consideration.

Respectfully submitted,

Arthur B. Sackler
Executive Director
NATIONAL POSTAL POLICY COUNCIL
1629 K Street, N.W.
Suite 300
Washington, D.C. 20006
(202) 508-3687

By: /s/ William B. Baker
POTOMAC LAW GROUP, PLLC
1717 Pennsylvania Avenue, N.W.
Suite 1025
Washington, DC 20006
(571) 317-1922
wbaker@potomacclaw.com