

Before the  
POSTAL REGULATORY COMMISSION  
WASHINGTON, DC 20268-0001

UNITED STATES POSTAL SERVICE  
MOTION FOR RECONSIDERATION OF ORDER NO. 4451:

Docket No. ACR2017

COMMENTS OF U.S. CHAMBER OF COMMERCE  
April 13, 2018

For the third time in this proceeding and at least the fourth time in recent proceedings, the U.S. Chamber of Commerce (Chamber) urges the Commission to unseal the revenue data related to inbound letter postal shipments from foreign postal services, aggregated by shape and by terminal dues group as described in Order No. 4451.

Nothing in the Postal Service's motion for reconsideration of Order No. 4451 undercuts the two fundamental components bases of the Commission's order. First, as the Commission has correctly determined, unsealing this highly aggregated data is unlikely to result in commercial harm to the Postal Service.

Second, as the Commission has also correctly determined, disclosure of the data in question will further the public interest by ensuring greater financial transparency of the Postal Service and its international postal operations.

The Chamber believes the second point deserves special emphasis. Transparency is acutely important in the context of international inbound shipments because, in recent years, the UPU has promoted a "special arrangement" for government-designated and government-protected enterprises that, operating under a cloak of secrecy, distorts international e-commerce and imposes unfair and unreasonable harm on U.S. domestic merchants and U.S. companies providing international delivery services.

A complete public accounting of the effects of government involvement in this increasingly important commercial market is overdue. The Commission's Order No. 4451 is a small but significant first step.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Sean Heather', with a long horizontal flourish extending to the right.

Sean Heather  
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