

BEFORE THE  
UNITED STATES OF AMERICA  
POSTAL REGULATORY COMMISSION  
WASHINGTON, DC 20268-0001

Competitive Product Prices  
Inbound Parcel Post (at UPU Rates)

Docket No. CP2018-232

PUBLIC REPRESENTATIVE COMMENTS ON CHANGES IN PRICES  
FOR INBOUND PARCEL POST (AT UPU RATES)

(June 19, 2018)

The Public Representative hereby provides comments pursuant to Order No. 4640.<sup>1</sup> In that Order, the Commission established the above referenced docket to receive comments from interested persons, including the undersigned Public Representative, on a Postal Service Notice of a change in rates not of general applicability for the Inbound Parcel Post (at UPU Rates) product.<sup>2</sup>

Included as Attachment 1 to the Notice is an application for non-public treatment of materials filed under seal. The Postal Service also filed as Attachments 2 the redacted version of UPU International Bureau (IB) Circular No. 40, showing the rates applicable to the Postal Service. It also included the following: a certification pursuant to 39 C.F.R. § 3015.5(c)(2) as Attachment 3, the redacted Postal Service data transmitted to the UPU to justify its bonus payments as Attachment 4, Redacted copies of Governors' Decision Nos. 14-04 and 11-6 as Attachments 5 and 6, respectively and a supporting financial model estimating the cost coverage in 2018.

On June 13, 2018, the Commission issued Chairman's Information Request No. 1.<sup>3</sup> The Postal Service filed its response on June 18, 2018.<sup>4</sup>

## COMMENTS

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<sup>1</sup> Order No. 4640, Notice and Order Concerning Changes in Prices for Inbound Parcel Post (at UPU Rates), June 11, 2018.

<sup>2</sup> Notice of the United States Postal Service of Filing Changes in Rates Not of General Applicability for Inbound Parcel Post (at UPU Rates), and Application for Non-Public Treatment, June 8, 2018, at 1 (Notice).

<sup>3</sup> Chairman's Information Request No. 1, June 13, 2018. (CHIR 1)

<sup>4</sup> Response of the United States Postal Service to Chairman's Information Request No. 1, June 18, 2018.

Pursuant to 39 U.S.C. § 3633(a), the Postal Service's competitive prices must not result in the subsidization of competitive products by market dominant products; ensure that each competitive product will cover its attributable costs; and, ensure that all competitive products collectively contribute an appropriate share of the institutional costs of the Postal Service.

Based upon a review of the financial data, the prices for the Inbound Parcel Post (at UPU Rates) product should generate sufficient revenues to cover costs and therefore meet the requirements of 39 U.S.C. § 3633(a).

Additionally, the Public Representative supports the clarification of the product description in the Mail Classification Schedule, as presented in CHIR 1.

## CONCLUSION

The Postal Service has established that these changes to rates for Inbound Parcel Post (at UPU Rates) are in compliance with the requirements of 39 U.S.C. § 3633(a). Thus, Public Representative recommends that the Commission approve the rates for Inbound Parcel Post (at UPU Rates).

The Public Representative respectfully submits the foregoing comments for the Commission's consideration.

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