

BEFORE THE
POSTAL REGULATORY COMMISSION

Annual Compliance Report 2018

:
: Docket No. ACR2018
:

**COMMENTS OF UNITED PARCEL SERVICE, INC. IN
RESPONSE TO NOTICE OF PRELIMINARY
DETERMINATION TO UNSEAL LIBRARY REFERENCE
PRC-LR-ACR2018-NP3
(April 19, 2019)**

United Parcel Service, Inc. (“UPS”) respectfully submits these comments in response to Order No. 5055 (April 12, 2019), where the Commission made a preliminary determination that Library Reference PRC-LR-ACR2018-NP3 should be unsealed.¹ These materials include analyses of Inbound Letter Post volume, revenue, attributable costs, and contribution by Universal Postal Union (“UPU”) country group and by shape. Order No. 5055 at 13.

UPS supports the Commission’s determination that the materials be unsealed. UPS agrees that the public has a strong interest in maintaining financial transparency at the Postal Service, a government entity that competes with private companies. The lack of access to the relevant nonpublic library references has made it difficult for UPS and other relevant stakeholders to meaningfully comment on the Postal Service’s costing practices for international products. In addition, the analyses of the data to be disclosed by Universal Postal Union (“UPU”) country group and by shape will shed light

¹ Notice of a Preliminary Determination to Unseal Library Reference PRC-LR-ACR2018-NP3, Dkt. No. ACR2018 (Apr. 12, 2019) (“Order No. 5055”), at 2.

on important issues with the current terminal dues system. Such concerns are specifically identified in the Commission's Order.

In addition, UPS agrees with the Commission's assessment that public disclosure of Library Reference PRC-LR-ACR2018-NP3 will not likely result in commercial harm to the Postal Service, given that the Postal Service aggregates the relevant data and analysis at the country group level and thus will not reveal particularized, operator-specific information. Order No. 5055 at 11. Indeed, aggregation of data is a common method of protecting commercially-sensitive information. For all these reasons, UPS supports unsealing Library Reference PRC-LR-ACR2018-NP3.

Respectfully submitted,

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