

Before the  
Postal Regulatory Commission  
Washington, D.C. 20268-0001

Competitive Product Prices  
Inbound E-format Letter Post

Docket No. CP2019-155

Comments of the U.S. Chamber of Commerce

June 21, 2019

On May 20, 2019, the United States Postal Service (USPS) requested the Postal Regulatory Commission (Commission) to approve a range of “self-declared rates” for a mix of services involving Inbound Letter Post Small Packets and Bulky Letters.<sup>1</sup> The Commission has requested interested parties to express views and offer comments on (1) “whether the planned changes are consistent with 39 U.S.C. 3632 and 3633 and 39 CFR part 3015” and (2) “whether the proposed prices are consistent with the policies outlined in the Presidential Memorandum.”<sup>2</sup> The Chamber is pleased that the Universal Postal Union (UPU) has agreed to an extraordinary Congress in September to address the distortion caused by terminal dues. The Commission’s proceeding is important in the event the United States exits the UPU, but more importantly also supports the Chamber’s preferred outcome of the United States remaining in the UPU, while moving to self-declared rates.

The USPS public notice appears to refer to four distinct services. The primary service may be described as a *downstream postal service* that provides transportation and delivery of goods and bulky documents from an ‘origin bulk mail facility’<sup>3</sup> to addressees. In this case, the origin bulk mail facilities are the USPS’s five International Service Centers (ISCs). In essence, the proposed service is a simplified version of First

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<sup>1</sup> USPS, “Notice and Order Concerning Rates Not of General Applicability for Inbound E Format Letter Post” (May 22, 2019) (hereafter, USPS Notice).

<sup>2</sup> Order No. 5102 at 5-6 (May 22, 2019). The Presidential Memorandum referred to by the Commission, and throughout this comment is, “Presidential Memorandum for the Secretary of State, Secretary of the Treasury, Secretary of Homeland Security, Postmaster General, and Chairman of the Postal Regulatory Commission” (Aug. 23, 2018).

<sup>3</sup> That is, a bulk mail facility in which mail is sorted for distribution to bulk mail facilities near the location of the addressees (‘destination bulk mail facilities’).

Class Package Service and Priority Mail services for packages weighing up to 2 kg that is suited to the needs of foreign postal operators.

The public notice states that ISC-to-addressee service is supplemented by an optional ancillary service, a *registration service* for which a separate charge is assessed. In addition, the public notice implies that USPS will also provide a second ancillary service, a *customs clearance service* for inbound goods. Since the proposed postal service will be a competitive product, USPS will be required to comply with US customs laws “in the same manner” as non-postal operators.<sup>4</sup> Finally, the public notice implies that USPS is proposing to provide a distinctly different service for inbound goods and bulky documents, a *transit service*, i.e., transportation of foreign mail in bulk from a US port of entry to a US port of departure for forwarding to a foreign postal operator.<sup>5</sup>

The public notice states that USPS is proposing a range of rates for the ISC-to-addressee service and a rate or rates for the registration service, but the actual rates are presented in non-public documents. The public notice makes no mention of rates for the customs clearance<sup>6</sup> and transit services.

**1 The Commission should require USPS to unseal or otherwise provide a public description of the rates, services, revenues, and costs of the proposed products that is sufficient to allow interested parties to provide informed comments.**

In the Postal Accountability and Enhancement Act of 2006, Congress sought to guarantee “a higher degree of transparency to ensure fair treatment of customers of the

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<sup>4</sup> 39 USC § 407(e)(2).

<sup>5</sup> See Docket No. MC2019-17, Transfer of Inbound Letter Post Small Packets to the Competitive Product List, “United States Postal Service Request to Transfer Inbound Letter Post Small Packets and Bulky Letters, and Inbound Registered Service Associated with Such Items, To the Competitive Product List” (Nov. 16, 2018), Attachment B, MSCS § 2340.1(d) (“Inbound Letter Post Small Packets and Bulky Letters service includes transit revenue for small packets and bulky letters transiting from a foreign country to another foreign country through the United States [emphasis added]”).

<sup>6</sup> USPS has testified to Congress that compliance with US customs laws in the same manner as non-postal operators would impose “enormous new costs upon the Postal Service — costs of approximately \$1.2 to \$4.8 billion over ten years. . . . [U]nder current international law, the Postal Service would be unable to charge most customers to recoup that cost.” *Stopping the Shipment of Synthetic Opioids: Oversight of U.S. Strategy to Combat Illicit Drugs: Hearing Before the Permanent Subcomm. on Investigations of the Senate Comm. on Homeland Security And Governmental Affairs*, 115th Cong., 1st Sess., at 90 (May 25, 2017).

Postal Service's and those companies competing with the Postal Service's competitive products."<sup>7</sup> Instead of exceeding pre-PAEA levels of transparency for competitive products, USPS's proposal in this docket offers an almost perfect model of opacity. The proposed services are not clearly defined. The proposed rates are shrouded in a double layer of darkness. Not only are the final rates unspecified but the range or rates from which the final rates will be selected is also hidden from public view. The costs and revenues of the proposed products are unstated even in the most aggregated format.

In these circumstances, interested parties are severely handicapped in their ability to provide informed comments on whether the proposal complies with applicable legal standards and the policies of the Presidential Memorandum. In particular, section 3(a) of the Presidential Memorandum directs the Secretary of State and USPS to achieve reforms that provide for:

- (i) a system of fair and nondiscriminatory rates for goods that promotes unrestricted and undistorted competition; and
- (ii) terminal dues rates that:
  - (A) fully reimburse the USPS for costs to the same extent as domestic rates for comparable services;
  - (B) avoid a preference for inbound foreign small packages containing goods that favors foreign mailers over domestic mailers; and
  - (C) avoid a preference for inbound foreign small packages containing goods that favors postal operators over private-sector entities providing transportation services.

To address such issues, interested parties need to know at a minimum (i) a specific description of each proposed product, including ancillary services; (ii) the details of the proposed range of rates and how USPS proposes to establish a rate from within this range; and (iii) the aggregated revenues and costs of the proposed products during the projected life of the proposed rates.<sup>8</sup>

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<sup>7</sup> S. Rept. No. 108-318, 108th Cong., 2d Sess., at 1 (emphasis added).

<sup>8</sup> Consider USPS's declaration that "the proposed rates would fully reimburse the Postal Service for its costs, even at the low end of the range, and indeed would clearly do so to a much greater extent than domestic rates for comparable services." USPS Notice at 18. USPS here highlights a critical policy

In Attachment 1 USPS offers several arguments in support of its request for non-public treatment of the data underlying its proposal. These points are unpersuasive and should be rejected by the Commission.

In point (2) USPS claims that foreign postal operators have a “proprietary interest” in the materials for which USPS requests non-public treatment. But the proposed rates are general default rates that have not been negotiated with any foreign postal operator. Foreign postal operators have no more of a proprietary interest in the costs and revenues of the proposed services than domestic mailers have in the costs and revenues of similar domestic services.

In point (4), USPS argues that competitors and domestic mailers could take unfair advantage of information about the prices and costs of the proposed services. For example, USPS declares, “competitors would be able to take advantage of the information to offer lower pricing to customers,” i.e., public prices will foster price competition. This is hardly an argument against public disclosure of the proposed rates. Since the proposed rates are only default rates, nothing prevents USPS from pursuing individual contracts on a more confidential basis. USPS further insinuates that non-postal operators would subsidize a domestic delivery service for goods and bulky documents (“while subsidizing any losses with profits from other customers”). This allegation is unsubstantiated and implausible. There is no incentive for such conduct since delivery of inbound goods and bulky documents is a small portion of the much larger US delivery services market.

Similarly, in point (5), USPS conjures up several hypothetical, illustrative examples of harm that would flow from unsealing the non-public data in this case. In all of the examples presented, the imagined harm would be prevented if the Commission provides for full disclosure of proposed rates and appropriately aggregated cost and revenue data. Given the enormous public interest in bringing to an end the economically distortive practices of the past, the Commission should give added weight to the need for transparency in implementing the balancing test under § 504(g)(3)(A).

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consideration, but interested parties are unable to comment on this assertion if the proposed products are not specifically defined and relevant rates and aggregated cost and revenue data are non-public.

**2 The Commission should require USPS to propose a specific schedule of rates for delivery of inbound goods and bulky documents; it should not pre-approve a range of rates.**

In principle, USPS's proposal to set rates for the ISC-to-addressee portion of the proposed services at a level somewhere between the retail and commercial rates for FCPS and PM services appears reasonable. This does not, however, justify USPS's request for a "blank check" pre-approval of all rates within a broad range. Section 3632(b)(1) of title 39 requires that "Rates and classes shall be established in writing complete with a statement of explanation and justification and the date as of which such rate or class takes effect."<sup>9</sup> This statutory requirement is not satisfied by a proposal for pre-approval of a range of rates from USPS will select a rate or rates to take effect at an unspecified date in the future.

Some will argue that pre-approval of a range of rates for competitive products is consistent with the Commission's rules. As far as competitive products are concerned, the Commission's rules mandate little more than a check to verify that proposed rates cover attributable costs. In most competitive product rate proceedings, the Commission approves proposed rates if this threshold test is passed. If this were all there is to Commission review of competitive product rates, there would be no reason for the Commission to ever require an explanation and justification for specific rates and classes or their effective dates. Once the Commission is assured that competitive product rates and services will cover attributable costs, why not allow USPS revise competitive products in its sole discretion indefinitely?

This simplistic approach understates the role of the Commission and the importance of public proceedings. While Part 3015 of the Commission's rules mandates no more than a review of competitive product rates under the criteria of 39 USC § 3633, nothing in Part 3015 precludes the Commission from considering other statutory criteria. Under title 39, all postal rates and classifications must conform to several public policy criteria in addition to the accounting rules of § 3633. For example:

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<sup>9</sup> This statutory requirement is embodied in the Commission's rules. 39 CFR §§ 3015.2(b) (changes in rates of general applicability), 3015.4(b) (change in class of general applicability), 3015.5(a) (rate or class not of general applicability).

- “Postal rates shall be established to apportion the costs of all postal operations to all users of the mail on a fair and equitable basis” (§ 101(d)).
- USPS rules and regulations must consistent with title 39 (§ 401(2)).
- Postal rates and classifications must not “make any undue or unreasonable discrimination among users of the mails” (§ 403(c)).
- USPS must not establish any rule which would “preclude competition or establish the terms of competition” (§ 404a(a)(1)).
- Rates and classes affecting international postal services should be consistent with the national policies set out in § 407(a).

The Commission may, in its discretion, consider these additional public policy criteria its review of competitive product rates and classes. Indeed, with respect to many of these issues, any interested party, including the Public Representative of the Commission, can compel the Commission to do so under § 3662. This does not imply that such issues should be or need to be considered in every or even most proposals for changes in competitive product rates and classes. But in the interest of justice and economy of proceedings, where such issues are plainly presented, it would be better to consider them before new rates and classes are placed in effect.

Plainly, pre-approval of a range of competitive product rates and classes would undermine the ability of the Commission and interested parties to raise and consider such public policy issues prior to implementation of new rates and classes. These additional statutory criteria are difficult or impossible to evaluate without the concreteness of specific rates. A public proceeding by the Commission provides the invaluable service of focusing public attention on changes in rates and classes. To allow USPS to quietly introduce new rates or classes from a pre-approved range without public notice will make it far more difficult for the Commission and interested parties to enforce these important public policies.

In support of its “unique and unprecedented”<sup>10</sup> request, USPS argues that pre-approval of a range of rates is necessary because it “provides the State Department with maximum negotiating flexibility to achieve the President’s stated goal to remain

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<sup>10</sup> Order No. 5102 at 2 (May 22, 2019).

within the UPU” reaches beyond the bounds of title 39. USPS Notice at 5. But the President’s stated goal is not to remain within the UPU under any circumstance. The President’s stated goal is to remain in the UPU if and only if the State Department is able “to negotiate bilateral and multilateral agreements that resolve the problems discussed in the Presidential Memorandum.” At another point USPS claims that “a range of rates “will provide the Postal Service the necessary flexibility to determine the optimal rates to set after taking into account the actual status later in the year of the circumstances involving E-format items, which are still-evolving.” USPS Notice at 2.

Such arguments are specious. On October 17, 2018, the President specifically directed USPS “to adopt self-declared rates for terminal dues as soon as practical, and no later than January 1, 2020.” As USPS concedes, it will “institute its rates for E-format items whether the U.S. is in or out of the UPU.” USPS Notice at 5. When asked to compare the costs that USPS will incur for the exchange of international mail depending on whether the US is in our out of the UPU, USPS admits that “the essential processing, transportation, and delivery costs . . . should remain relatively stable.”<sup>11</sup>

If USPS will introduce self-declared rates whether or not the US is in the UPU and if costs will remain “relatively stable” in either case, then a USPS announcement of specific rates for delivery of inbound goods and bulky documents can have no significant effect on the “negotiating flexibility” of the State Department or the “optimal rates to set after taking into account the actual status later in the year.” If the President later decides not to implement self-declared rates in accord with the Presidential Memorandum, then USPS can proposed adjustments to the announced rates, but it is hardly reasonable to request the Commission to pre-approve a range of rates in case the President abandons a policy, which the Administration has developed and pursued over the last year and half.

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<sup>11</sup> Responses of the United States Postal Service to Questions 1-10 of Chairman’s Information Request No. 1 ((Jun. 7, 2019) at 8 (answer to question 5).

### **3 The proposed rates continue discrimination between foreign postal operators, non-postal operators, and domestic mailers in contradiction of the Presidential Memorandum.**

The proposed rates and services would continue discrimination between foreign postal operators, on the one hand, and domestic mailers and non-postal operators, on the other hand, even when they tender shipments of goods and bulky documents that are identical in all material respects. Although specifics of USPS's proposal are sealed, USPS states the proposed rates are limited to foreign postal operators and not available to non-postal operators and domestic mailers.<sup>12</sup>

The proposed rates and services contradict the principles of the Presidential Memorandum, which rejects such discrimination in unqualified terms.<sup>13</sup> As noted above, the Presidential Memorandum calls for "fair and nondiscriminatory rates for goods" and condemns any "preference for inbound foreign small packages containing goods that favors foreign mailers over domestic mailers [or] postal operators over private-sector entities providing transportation services." This leaves no room for "reasonable" preferences. The position of the Presidential Memorandum is, rightly, that any preference based solely on the non-American status of the mailer or the "designated operator" status of the carrier is undue and unreasonable and inconsistent with the national commitment to promote and encourage "unrestricted and undistorted competition."

USPS attempts to justify disregard of the Presidential Memorandum by insisting that rate discrimination between foreign postal operators and other similarly situated

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<sup>12</sup> USPS Notice at 13 ("The new rates are non-published rates 'not of general applicability' that are offered to foreign postal operators. Specifically, the scope of the new rates is limited to E-format items tendered by foreign postal operators"). There is no indication whether the proposed rates will be available for foreign postal operators that operate extraterritorial offices of exchange (ETOE).

<sup>13</sup> USPS points out that it "does not concede, as a legal matter, that the scope of the Commission's statutory review of the new rates pursuant to 39 U.S.C. § 3633(a) encompasses policies set forth in the Presidential Memorandum." USPS Notice at 17 n.29. Nonetheless, in reviewing rates and classes affecting international postal services, the Commission may, indeed must, consider the national policies with respect to international postal and delivery services in § 407. Moreover, it appears that the President's decisions with respect to international postal affairs appear to be binding on USPS as a matter of constitutional law. See Department of Justice, Office of Legal Counsel, "Memorandum for Judith M. Bellow, General Counsel, Office of the United States Trade Representative" (Jun. 2, 1988). In any case, the Commission may consider the Presidential Memorandum as a reasonable and authoritative, although not necessarily binding, exposition of statutory policies, which are binding.

mailers is justified by three factors.

There are several reasons that justify limiting these rates only to postal operators and not other types of carriers, based on the fundamental differences between postal operators and private carriers:

- The E-format rates are designed for volume that concentrates at a handful of select international gateways which are designed to facilitate international mail exchange with foreign postal operators that, as noted above, do not employ domestic postage payment techniques, thereby necessitating a per item and per kilogram methodology.
- The rates are designed for the profile that foreign postal operators dispatch to the United States, which include averages based on a line of best fit in lieu of zoned rates; moreover, the foreign postal operators are believed to dispatch all of their E-format volume destined for the United States to the Postal Service, and controls against cream-skimming abuses by private operators that have different profiles and that do not dispatch all of their E-format volume destined for the United States to the Postal Service would be difficult to manage.
- Foreign postal operators rely on a degree of simplicity that is driven by more limited capabilities and the need for uniformity to ensure that universal service can be provided throughout the world (consistent with Section 407(a)(1)), but these capability limitations do not generally serve as practical barriers for private carriers.<sup>14</sup>

None of these factors offers a plausible justification for discrimination between foreign postal operators and other similarly situated domestic mailers and international non-postal operators.

The first alleged basis for discrimination does not pretend to identify a justification. It merely states that the proposed rates are designed for items tendered at “a handful of select international gateways” and expressed in a format — a per kilogram and per item charge — that is convenient for foreign postal operators. There is no indication why domestic mailers and non-postal operators would not find a per kilogram/per item rate equally convenient<sup>15</sup> or why they could not likewise tender similar

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<sup>14</sup> USPS Notice at 13-14 (emphasis added).

<sup>15</sup> As USPS says, “The per-item and per kilogram rate approach that is common among postal operators is used because the alternative of separately weighing and rating each inbound international

items to the same international gateways (or similar origin bulk mail facilities).

The second alleged basis for discrimination is based on unsupported allegations regarding the distribution of items among USPS's eight distance-based geographic zones. USPS states that "rates are designed for the profile that foreign postal operators dispatch to the United States, which include averages based on a line of best fit in lieu of zoned rates." USPS continues "foreign postal operators are believed to dispatch all of their E-format volume destined for the United States to the Postal Service." USPS alleges exclusion of non-postal operators is necessary to prevent "cream-skimming abuses by private operators that have different profiles and that do not dispatch all of their E-format volume destined for the United States to the Postal Service."

These allegations do not add up to a credible basis for discrimination against American domestic mailers or non-postal operators. There is no indication of how the proposed rates take into account a specific distribution of items among geographic zones<sup>16</sup> or whether items tendered by different foreign postal operators are characterized by a similar distribution.<sup>17</sup> If inbound goods and bulky documents tendered by foreign postal operators were characterized by a similar geographic distribution, then there is no reason not to offer the same rates to other mailers who tender items with a similar geographic distribution. More fundamentally, however, even if inbound postal goods and bulky documents are currently tendered according to a specific geographic distribution, there can be no assurance that this pattern will continue. Introduction of substantially higher delivery rates will significantly increase the economic incentives for seeking out the most economical delivery options. Even if foreign postal operators continue to tender all of their volumes to USPS for delivery,

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mailpiece would not be possible without expending considerable time and effort." Responses of the United States Postal Service to Questions 1-10 of Chairman's Information Request No. 1 ((Jun. 7, 2019) at 13 (answer to question 7(b)).

<sup>16</sup> USPS Notice at 6 suggests that the proposed rates are derived from a least-squares regression of zoned rates unweighted by such a distribution ("The proposed rates for E-format items constitute a 'line of best fit' using a per item rate and per kilogram rate that are based on the most equivalent domestic products").

<sup>17</sup> Use of the word "believed" in phrase "foreign postal operators are believed to dispatch all of their E-format volume destined for the United States to the Postal Service" strongly suggests that USPS is stating a belief unsupported by evidence.

there is no way to prevent large commercial mailers from “creaming skimming” by shifting selected goods to lower cost delivery networks in the US. In its request for non-public treatment of all rates and supporting documents, USPS anticipates that after introduction of self-declared rates there will be fierce competition for delivery of inbound goods and bulky documents. In a highly competitive market, there is no reason to suppose that the commercially minded foreign postal operators and/or their equally competitive customers will behave differently from domestic mailers and non-postal operators.<sup>18</sup>

The third alleged basis for discrimination likewise fails to offer a justification for discrimination. USPS states that “foreign postal operators rely on a degree of simplicity . . . but these capability limitations do not generally serve as practical barriers for private carriers.” Tariff simplicity, however, benefits all mailers, not only foreign postal operators. Even if domestic mailers and non-postal operators can cope with more complicated tariff schedules, this provides no justification for barring domestic mailers and non-postal operators from access to lower cost, simplified tariff schedules.

Later in its public notice, USPS resumes its claim that the proposed rates do not discriminate against domestic mailers and non-postal operators, largely by recycling previous allegations. USPS begins by declaring:

First, as demonstrated in the supporting financial documentation, the proposed rates would fully reimburse the Postal Service for its costs, even at the low end of the range, and indeed would clearly do so to a much greater extent than domestic rates for comparable services. [USPS Notice at 18]

Since the supporting financial documentation is sealed, it is impossible for interested parties to assess the merits of this claim. Nonetheless, if the proposed rates “would fully reimburse the Postal Service for its costs . . . to a much greater extent than domestic

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<sup>18</sup> There is no reason why a system of simple per kilogram and per item rates cannot take into account differences in the cost of serving different geographic zones. A set of zoned per kilogram and per item rates could be applied to any shipment of goods and bulky documents if the mailer informs USPS of the distribution of items and weights among geographic zones (data which is also required for custom clearance). It is likewise self-evident that USPS’s costs vary so markedly by distance that no single per kilogram and per item system of rates makes economic sense in a competitive market for delivery of inbound goods and documents.

rates for comparable services,” there can be no objection to allowing domestic mailers and non-postal operators access the same rates and services.

USPS continues by claiming that the proposed rates do not discriminate against non-postal operators because of “the fundamental differences between postal operators and private carriers that must be taken into account.” USPS Notice at 18. This appears to be no more than a reference to the supposed differences between foreign postal operators and non-postal operators advanced earlier. USPS then asserts:

Third, the Postal Service’s rates avoid a preference for foreign mailers over domestic mailers. The rates proposed in this docket establish rate parity between E-format items containing goods and the most equivalent domestic products, and would therefore eliminate the economic distortion occasioned by the extension of terminal dues rates that tend to favor foreign e-commerce vendors over domestic vendors that are subject to domestic postage rates. [USPS Notice at 19]

Yet, in the next paragraph, USPS concedes that “the proposed rate range would not be identical to the domestic retail and commercial rates.” Id. USPS argues that “the differences are justified because of differences in cost structures and characteristics, practical concerns, and the need for simplicity (as discussed above).” Id. USPS is again relying on the unfounded allegation that shipments of goods and bulky documents tendered by foreign postal operators are inherently different from tenders of similar mail by domestic mailers and non-postal operators.

USPS goes on to declare that some features of the services offered under the proposed rates will differ from the current FCPS and PM services provided to domestic mailers. This observation supports the opposite conclusion from that which USPS is seeking to draw. Given fierce competition between domestic merchants and foreign merchants, both domestic and foreign merchants should have access to different grades of delivery services that may include different bundles of features.

In answer to questions from the Chairman, USPS offers still another, more pernicious, justification for discrimination between foreign post offices and other similar mailers:

Non-postal operators should not be able to pay the rates with the per-piece and per-kilogram components, because they are not providing the

reciprocal service to the Postal Service for U.S.-origin mail as foreign postal operators do, and they do not settle with the Postal Service based on imbalances because they do not provide reciprocal service. The Postal Service receives a corresponding benefit for its outbound mail dispatched abroad when this approach is used reciprocally with a foreign postal operator.<sup>19</sup>

USPS is here arguing that preferences for foreign postal operators are justified because foreign postal operators provide reciprocal preferences for USPS. Yet the gravamen of the US complaint with the UPU is that this system of reciprocal preferences between postal operators is anticompetitive and distortive. While claiming to support the Presidential Memorandum, USPS is proposing to perpetuate the very practices that the Presidential Memorandum is seeking to end.

In sum, USPS offers no plausible or logical justification for limiting the access of non-postal operators and domestic mailers to the proposed postal service from origin bulk mail facilities to addressees. USPS offers no justification at all for limiting the other services to be provided by the proposed rates.

#### **4 Conclusions**

Under the Presidential Memorandum, USPS is required to propose a simplified version of its FCPS and PM services that is suited to the needs of foreign mailers. Although specifically designed to accommodate the needs of foreign mailers, it is important to recognize that the proposed rates and services constitute a wholly domestic postal service that is similar to existing domestic postal services. USPS has offered no plausible justifications why these proposals should be enveloped in extraordinary secrecy, why specific rates cannot be proposed, or why these simplified domestic postal services for goods should not be equally available to domestic mailers and non-postal operators. Accordingly, the Chamber urges the Commission to —

- To require USPS to unseal or otherwise provide in public documents (1) a complete description of the proposed products and, for each product, the

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<sup>19</sup> Responses of the United States Postal Service to Questions 1-10 of Chairman's Information Request No. 1 ((Jun. 7, 2019) at 12 (answer to question 7(b)) (emphasis added).

proposed rates and underlying rate methodology and (2) appropriately aggregated cost and revenue sufficient to allow interested parties to provide informed comments on the consistency of the proposed rates and services with title 39 and the Presidential Memorandum;

- To require USPS to provide a specific schedule of rates (zoned or unzoned) for delivery to US addressees of goods and bulky documents received at International Service Centers or equivalent origin bulk mail facilities whether tendered by foreign post offices or by domestic mailers or non-postal operators under similar conditions.
- To give interested parties at least two weeks to comment on the revised proposals.

Respectfully submitted,

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

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