



June 21, 2019

Postal Regulatory Commission  
901 New York Avenue, NW Suite 200  
Washington, D.C. 20268

**RE: Docket No. CP2019-155**

To the Attention of the Commission:

On behalf of our organization's diverse array of entrepreneurs, small business owners, and state and local business organizations, the Small Business & Entrepreneurship Council (SBE Council) is respectfully submitting its views regarding the ongoing concerns with international mailing measures and pricing regimes proposed by the U.S. Postal Service (USPS).

As our organization has emphasized in previous communications, there is a clear need to ensure a non-discriminatory pricing system that will allow domestic sellers to access a level playing field in reaching American consumers. The status quo regimes have regrettably set in place fundamental challenges in which foreign mailers continue to be charged much lower rates by USPS in comparison to the prices that American businesses pay to send items within the United States.

Thankfully, the Administration has established a positive course of action to promote fairness, as well as unrestricted and undistorted competition. This includes the stated objectives (in Presidential Memoranda dated August 23, 2018) to set rates that fully reimburse the USPS for costs to the same extent as domestic rates for comparable services, and to avoid preferential treatment of inbound foreign small packages containing goods.

To consider these issues, the member countries of the Universal Postal Union have agreed to convene an extraordinary Congress scheduled for Sept. 24-25 in Geneva, Switzerland. The outcomes of a vote on multiple proposals will certainly set new a course on objectives and requirements for postal operators, which largely renders the Postal Service's advancements in the CP2019-155 docket to be premature.

Thus we encourage the Commission to withhold any actions and directives in this case until after the UPU's decisions on remuneration have taken place, and following initiation of the State Department's subsequent procedures.

As the Postal Service continues to outline alternative pricing regimes surrounding this service segment, our organization believes strongly in adhering to procedural specificity and transparency in order to best serve the interests of small businesses.

In the latest proposed rates notice, the Postal Service calls for a range of rates, which marks an inherent lack of ideal pricing specificity that small businesses need in order to align their cost structures in accordance with fluctuating market conditions.

Furthermore, the Postal Service's measures to seek non-public treatment of materials and process such filings under-seal represents a fundamentally non-democratic approach that diminishes the possibilities for business associations, elected lawmakers, industry analysts, and the general public from offering substantive feedback and perspectives of the impacts downstream.

SBE Council is steadfastly focused on strengthening the environment for robust entrepreneurship, investment, innovation and small business growth. We express our thanks to the Postal Regulatory Commission for this opportunity to express our views, and for maintaining open dialogues on key matters impacting the nation's postal system.

Our leadership would be pleased to engage directly with Commission should any further opportunities arise for these proceedings.

Sincerely,



Karen Kerrigan  
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