

Before the Postal Regulatory Commission
Washington, DC 20268-0001

TRANSFER OF INBOUND LETTER POST SMALL
PACKETS TO COMPETITIVE PRODUCT LIST

Docket No. MC2019-17

COMPETITIVE PRODUCT PRICES
INBOUND E-FORMAT LETTER POST

Docket No. CP2019-155

**COMMENTS OF THE INTERNATIONAL MAILERS ADVISORY GROUP
(January 30, 2020)**

Pursuant to Order No. 5412, the International Mailers Advisory Group (IMAG) respectfully submits these comments regarding the Commission's Preliminary Determination to Unseal Self-Declared Rates for Inbound Letter Post and Small Packets and Bulky Letters (collectively referred to as Inbound E-Format Letter Post). In its order, the Commission considered the appropriate degree of non-public protection, if any, to be accorded to the specific per-item and per-kilogram self-declared rates for Inbound E-Format Letter Post. Specifically, the Commission considered whether it is appropriate to unseal the rate chart the Postal Service provided with its October 29, 2019, notice, in which the Postal Service requested non-public treatment of the rates.

IMAG supports the Commission's preliminary determination that it is not appropriate to accord non-public treatment to the self-declared rates for Inbound E-Format Letter Post. IMAG agrees with the Commission's determination that once the Universal Postal Union's (UPU) International Bureau (IB) publishes countries' self-declared rates, unsealing the Postal Service's Inbound E-Format Letter Post rates would not result in the commercial harm identified by the Postal Service. Under the Acts of the Geneva Congress, which entered into force on January 1, 2020, eligible countries begin the transition to self-declared rates in 2020. Designated operators that are self-declaring are required to provide any self-declared rates to the UPU IB by March 1, 2020, and the UPU IB will publish those rates after April 1, 2020. The Commission in its order

says Inbound E-Packet Letter Post rates should be unsealed shortly after the UPU IB publishes these rates.

IMAG requests in a final order that the Commission define “shortly” and set a specific number of days as a requirement for the Postal Service to unseal the rates, perhaps 30 days after the UPU reveals them.

IMAG also concurs with the Commission’s determination that the Postal Service has not explained why self-declared rates should be afforded non-public treatment when prices for other competitive products are publicly available. As we stated in our initial comments to CP2019-155, the published rate should be publicly available, while any negotiated service agreement rates could remain under seal.

To that end, IMAG would also ask that once these self-declared rates are unsealed, the Commission should allow for a public comment period as it would allow for any other published rate. Up to this point in the proceedings, IMAG and other interested parties have been commenting on something we have not even seen yet. A comment period on the actual rates should be afforded to parties.

Respectfully submitted,



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