

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

Before Commissioners:

Robert G. Taub, Chairman;
Michael Kubayanda, Vice Chairman;
Mark Acton;
Ann C. Fisher; and
Ashley E. Poling

Size Limits for International Packets

Docket No. MC2021-25

ORDER APPROVING MINOR CORRECTIONS TO THE
MAIL CLASSIFICATION SCHEDULE

(Issued November 25, 2020)

I. INTRODUCTION

On November 5, 2020, the Postal Service filed a notice of minor classification change concerning international mail in the Mail Classification Schedule (MCS) pursuant to 39 C.F.R. § 3040.212.¹ For the reasons discussed below, the Commission approves the proposed changes as minor corrections to product descriptions in the MCS.

¹ Notice of the United States Postal Service of Minor Classification Changes Concerning the Minimum Size Limit for International Small Packet, November 5, 2020 (Notice).

II. BACKGROUND

The Postal Service explains that “[t]he purpose of these minor changes is to revise the size limits for international small packet[s], as they appear in the following sections of the MCS:

- 2340.2 Inbound Letter Post Small Packets and Bulky Letters
- 2510.3.2 Global Expedited Package Services Contracts
- 2510.5.2 Global Bulk Economy Contracts
- 2510.6.2 Global Plus Contracts
- 2510.7.2 Global Reseller Expedited Package Contracts
- 2510.8.2 Global Expedited Package Services—Non-Published Rates”

Notice at 1. The Postal Service states that it is also providing notice of changes to the size limits for Inbound Letter Post rolls in MCS section 2340.2. *Id.* at 1 n.1. It notes that the proposed changes are similar to the changes to size limits for Outbound First-Class Package International Service, International Priority Airmail packets, and International Surface Air Lift packets that were included in the Postal Service’s rate adjustment filing in Docket No. CP2021-15 to conform with international standards that limit the minimum length to 6 inches and minimum height to 4 inches. *Id.* at 1-2. The changes are intended to take effect on January 24, 2021, in conjunction with the implementation of the Competitive product rate adjustment filed in Docket No. CP2021-15.²

The Postal Service asserts that the Notice satisfies the requirements of 39 C.F.R. part 3040, subpart E because “the changes described should result in the MCS more accurately representing the Postal Service’s current offerings.” Notice at 2; see 39 C.F.R. § 3040.190(a). The Postal Service states that the Notice is filed at least 15 days before the intended effective date, and the changes merely revise size limits for international small packets as they appear in the MCS without otherwise changing product offerings or the prices or price groups applicable to such products and countries. Notice at 2-3; see

² *Id.* at 2; see Docket No. CP2021-15, Order Approving Price Adjustments for Competitive International Products, November 24, 2020 (Order No. 5760).

39 C.F.R. §§ 3040.190(b) and (c). The Postal Service concludes that “these minor classification changes do not constitute material changes, to the product descriptions of the products that might be affected.” Notice at 3; see 39 C.F.R. § 3040.190(c). The Notice includes a copy of the affected sections of the MCS with the proposed changes in legislative format as required by 39 C.F.R. § 3040.190(c)(3). *Id.* Attachment 1.

On November 6, 2020, the Commission issued an order pursuant to 39 C.F.R. § 3040.191 establishing this docket, appointing a Public Representative, and providing interested persons with the opportunity to comment.³

III. COMMENTS

The Public Representative submitted comments on November 20, 2020.⁴ The Commission received no other comments. The Public Representative states that he has reviewed the Notice, proposed classification changes, and applicable statutory and regulatory provisions. PR Comments at 2. Based on this review, he concludes that “the proposed MCS changes are minor classification changes that comply with 39 CFR part 3040, subpart E.” *Id.*

IV. COMMISSION ANALYSIS

The Postal Service filed the proposed changes pursuant to 39 C.F.R. § 3040.212, which requires the Postal Service to notify the Commission of updates to the size and weight limitations for Competitive mail matter pursuant to 39 C.F.R. part 3040, subpart E, which concerns material changes or minor corrections to the MCS. Pursuant to 39 C.F.R. § 3040.192, and for the reasons stated below, the Commission approves the proposed changes as minor corrections to product descriptions in the MCS.

³ See Notice and Order Concerning Minor Changes to Product Description, November 6, 2020 (Order No. 5750).

⁴ Public Representative Comments, November 20, 2020 (PR Comments).

The paramount consideration in determining whether a classification change is a material change or a minor correction is “the degree to which the proposed alteration affects the characteristics of the product.”⁵ In Docket No. RM2015-6, the Commission explained that factors for determining whether a change is material include whether the proposed change would significantly alter the user experience for the product and whether it would significantly impact competitors offering a similar service. See Order No. 2250 at 10.

The Commission finds that the Postal Service’s proposed changes are minor corrections because they neither materially impact the characteristics of any products nor change the user experience for these products. Except for the size limits, the proposed changes will not otherwise affect product offerings, prices, or price groups. There is no evidence that the proposed changes will significantly impact competitors offering a similar service.

The Commission agrees with the Public Representative’s determination that the proposed changes are minor classification changes that comply with 39 C.F.R. part 3040, subpart E. The Postal Service complied with all relevant procedural requirements of 39 C.F.R. § 3040.190. The proposed changes will also improve the accuracy of the product descriptions in the MCS and should allow mailers to more precisely locate relevant information.

For these reasons, the Commission concludes that the proposed classification changes are minor corrections to product descriptions in the MCS that comply with 39 C.F.R. part 3040, subparts E and F. The proposed classification changes are not inconsistent with any applicable provisions of title 39.

⁵ See Docket No. RM2015-6, Notice of Proposed Rulemaking on Changes and Corrections to the Mail Classification Schedule, November 14, 2014, at 9, 14 (Order No. 2250).

V. ORDERING PARAGRAPHS

It is ordered:

1. The changes proposed in the Notice of the United States Postal Service of Minor Classification Changes Concerning the Minimum Size Limit for International Small Packet[s], filed in Docket No. MC2021-25 on November 5, 2020, are approved.
2. The proposed classification changes are minor corrections to product descriptions in the Mail Classification Schedule that comply with 39 C.F.R. part 3040, subparts E and F, and are not inconsistent with any applicable provisions of title 39.
3. Revisions to the Mail Classification Schedule appear below the signature of this Order and are effective as of January 24, 2021, in conjunction with the implementation of the Competitive product rate adjustment filed in Docket No. CP2021-15.

By the Commission.

Erica A. Barker
Secretary

CHANGES TO THE MAIL CLASSIFICATION SCHEDULE

The following material represents a change to the Mail Classification Schedule. The Commission uses two main conventions when making changes to the Mail Classification Schedule. New text is underlined. Deleted text is struck through.

Part B—Competitive Products

2300 International Products

2340 Inbound Letter Post Small Packets and Bulky Letters

2340.2 Size and Weight Limitations

Small Packets and Bulky Letters (E Format)

	Length	Height	Thickness	Weight
Minimum	5.5 <u>6</u> inches	3.5 <u>4</u> inches	0.007 inch <u>2</u>	none
Maximum	24 inches			4.4 pounds ¹
	Length plus height plus thickness of 36 inches			

Rolls (E Format)

	Length	Length plus twice the diameter	Weight
Minimum	3.94 <u>4</u> inches	6.69 <u>6.75</u> inches	none
Maximum	35.43 <u>36</u> inches	40.94 <u>42</u> inches	4.4 pounds

2500 **Negotiated Service Agreements**

2510 **Outbound International**

2510.3 **Global Expedited Package Services (GEPS) Contracts**

2510.3.2 Size and Weight Limitations

*First-Class Package International Service &
Commercial ePacket Service*

Packages (Small Packets)

	Length	Height	Thickness	Weight
Minimum	Large enough to accommodate postage, address, and other required elements on the address side			none
	<u>6 inches</u>	<u>4 inches</u>	=	
Maximum	24 inches			4 pounds for FCPIS
	Length plus height plus thickness of 36 inches			4.4 pounds for CeP

2510.5 Global Bulk Economy (GBE) Contracts

2510.5.2 Size and Weight Limitations

Packages (Small Packets)

	Length	Height	Thickness	Weight
Minimum	Large enough to accommodate postage, address, and other required elements on the address side			none
	<u>6 inches</u>	<u>4 inches</u>	=	
Minimum	24 inches			4 pounds
	Length plus height plus thickness: <u>of 36 inches</u>			

2510.6 Global Plus Contracts

2510.6.2 Size and Weight Limitations

Packages (Small Packets)

	Length	Height	Thickness	Weight
Minimum	Large enough to accommodate postage, address, and other required elements on the address side			none
	<u>6 inches</u>	<u>4 inches</u>	=	
Maximum	24 inches			4 pounds for FCPIS 4.4 pounds for CeP, IPA, and ISAL
	Length plus height plus thickness of 36 inches			

2510.7 Global Reseller Expedited Package Contracts

2510.7.2 Size and Weight Limitations

Outbound Single-Piece First-Class Package International Service

Packages (Small Packets)

	Length	Height	Thickness	Weight
Minimum	Large enough to accommodate postage, address, and other required elements on the address side			none
	<u>6 inches</u>	<u>4 inches</u>	=	
Minimum	24 inches			4 pounds
	Length plus height plus thickness of 36 inches			

2510.8 Global Expedited Package Services (GEPS)—Non-Published Rates

2510.8.2 Size and Weight Limitations

First-Class Package International Service

Packages (Small Packets)

	Length	Height	Thickness	Weight
Minimum	Large enough to accommodate postage, address, and other required elements on the address side			none
	<u>6 inches</u>	<u>4 inches</u>	=	
Minimum	24 inches			4 pounds
	Length plus height plus thickness of 36 inches			
