

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

Classification Changes  
Outbound Single-Piece First-Class  
Package International Service

Docket No. MC2021-91

CHAIRMAN'S INFORMATION REQUEST NO. 1

(Issued May 21, 2021)

To clarify the Postal Service's request for Mail Classification Schedule (MCS) changes concerning Outbound Single-Piece First-Class Package International Service (FCPIS),<sup>1</sup> the Postal Service is requested to provide written responses to the following questions. Answers should be provided as soon as practical, but no later than May 27, 2021.

1. The proposed revision to MCS § 2335.1.a would remove the requirement that FCPIS packages be subject to the provisions of the Postal Convention of the Universal Postal Union (UPU). Request, Attachment 1 at 3. The Postal Service states that the reason for this change is to accommodate potential implementation of the Outbound Commercial Provider Initiative (OCPI) with the FCPIS product, permitting the Postal Service to use a commercial delivery provider rather than the destination country's postal operator. Request at 2. However, removal of the requirement that FCPIS packages adhere to the provisions of the Postal Convention of the UPU could permit operational changes other than those required to implement OCPI. To address this possibility, please answer the following questions:

---

<sup>1</sup> Request of the United States Postal Service for Classification Changes Concerning Outbound Single-Piece First-Class Package International Service, May 13, 2021 (Request).

- a. The existing requirement that FCPIS packages adhere to the provisions of the Postal Convention of the UPU constrains the Postal Service to use the destination country postal operator for delivery. Please identify and discuss any additional constraints on FCPIS service imposed by that existing requirement.
  - b. For each of the constraints identified in response to question 1.a., please discuss whether hypothetical operational changes (other than those associated with OCPI) enabled by the removal of that constraint could impact compliance with 39 U.S.C. § 3633 and 39 C.F.R. part 3035, as per 39 C.F.R. § 3040.181(b)(2).
  - c. For each of the constraints identified in response to question 1.a., please discuss whether hypothetical operational changes (other than those associated with OCPI) enabled by the removal of that constraint could impact the users of FCPIS and competitors, as per 39 C.F.R. § 3040.181(c).
2. The Postal Service states that “the OCPI relies on commercial customs practices in the destination country, and as such, results in the same practices being applied to shipments originating with the Postal Service as with competing private sector entities.” Request at 6.
  - a. Please specify whether there would be customs clearance costs attributable to FCPIS delivered by a commercial provider that are not currently attributable to FCPIS delivered by designated postal operators. Please also specify any other costs the Postal Service may incur for OCPI that are currently not attributable to the FCPIS product.
  - b. Please identify the approximate percentage of FCPIS volume and approximate anticipated percentage of unit cost changes for countries

where the Postal Service has, or may have, concerns regarding the operator's service.

3. The Postal Service states that competitors of the Postal Service may be affected by the Postal Service's capacity to offer new services that are currently unavailable through the postal channels, reduce cost of destination country delivery for U.S. origin items, and potentially improve service delivery performance for the FCPIS product. Request at 5-7.
  - a. Please provide additional detail concerning the anticipated impact on competitors stated on page 6 of the Request.
  - b. Please explain the operational differences that would exist between FCPIS delivered by a commercial provider and FCPIS delivered by a designated postal operator.
  - c. Please indicate whether the Postal Service would continue to send any FCPIS items through postal channels in countries where the Postal Service would be using a commercial OCPI provider.
  - d. Please confirm whether a mailer will know in advance if its FCPIS items will be delivered by a commercial operator or a designated postal operator if OCPI is implemented in a particular country, and whether a mailer will be able to decide if FCPIS items are delivered by the designated postal operator or a commercial operator.

By the Chairman.

Michael Kubayanda