

**BEFORE THE  
POSTAL REGULATORY COMMISSION**

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**COMPETITIVE PRODUCT PRICES --  
EXPRESS MAIL INTERNATIONAL  
BILATERAL/MULTILATERAL AGREEMENTS**

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**Docket No. CP2008-7**

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**COMMENTS OF UNITED PARCEL SERVICE  
IN RESPONSE TO ORDER CONCERNING PRICES  
UNDER EXPRESS MAIL INTERNATIONAL  
BILATERAL/MULTILATERAL AGREEMENTS  
(June 16, 2008)**

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Pursuant to Commission Order No. 79 (June 3, 2008), United Parcel Service comments on the United States Postal Service's notice of the Governors' decision establishing Inbound Express Mail International ("EMS") contracts and the Postal Service's notice that it has entered into a specific EMS contract. The Commission has invited interested parties to comment on whether the Postal Service's planned EMS contracts are consistent with PAEA.

We are not able to comment on whether the proposed contracts are consistent with PAEA because all of the information surrounding the Governors' decision and the contract itself have been filed under seal. As we have said in our comments filed today in Docket No. CP2008-5 regarding Global Expedited Package Services contracts, we urge the Commission to require the public disclosure of this information, adopting protective measures for any part of the information that is truly commercially sensitive.

UPS commends the Commission for treating the initial EMS agreement as a new product. Moreover, we suggest that the Commission resist any presumption that the markets for international package delivery and expedited services are perfectly competitive markets. Private carriers face more onerous customs and brokerage requirements in both the United States and abroad than postal administrations do, making these markets less competitive than is often assumed.

Respectfully submitted,

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