

Before the
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Competitive Products Prices
Global Expedited Package Services 1
(CP2008-5)
Negotiated Service Agreement

Docket No. CP2009-15

PUBLIC REPRESENTATIVE COMMENTS
IN RESPONSE TO ORDER NO. 144

(December 12, 2008)

The Public Representative hereby comments on the Postal Service's request to add an additional Global Expedited Package Services 1 (GEPS 1) contract.¹ In Order No. 144, the Commission established Docket No. CP2009-15 to consider this request and appointing the undersigned as the Public Representative to represent the interest of the general public in these proceedings.

Overview

The Public Representative believes that this contract satisfies the statutory requirements for cost coverage, is functionally equivalent to be placed into GEPS 1 and is categorized appropriately as a Competitive Product.

¹ Notice of the United States Postal Service Filing of Functionally Equivalent Global Expedited Package Services 1 Negotiated Service Agreement, December 2, 2008 (Notice). The Postal Service filed an unredacted copy of the contract and supporting materials under seal.

Cost Coverage

The Public Representative after reviewing the contractual agreement and the supplemental financial materials provided by the Postal Service under seal, and after consulting appropriately with technical staff, believes that the GEPS contract described satisfies the public interest by comports with the statutory requirement that ensures that competitive products cover their costs, are not subsidized by market dominant products and allow competitive products as a whole to contribute their share of institutional costs.

Appropriate Categorization

Assessing the data as filed, the Public Representative believes that the proposed CP2009-13 contract is appropriately categorized as a Competitive Product, and is functionally equivalent to the other contracts within the GEPS 1 (CP2008-5) shell classification.

Incremental Volume

The Public Representative, considering the totality of the available data, believes that this contract is likely to represent new/increased volume. The specifics of the contract also suggest that it will enhance international trade and offer flexibility to the shipper by providing increased opportunities for sale of merchandise to other countries from the United States.

The Public Representative respectfully submits the preceding Comments for the Commission's consideration.

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Public Representative

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