

Before the  
POSTAL REGULATORY COMMISSION  
WASHINGTON, DC 20268-0001

Mail Classification Schedule –  
Minor Modifications for GXG Service

Docket No. MC2009-22

PUBLIC REPRESENTATIVE COMMENTS IN RESPONSE TO  
UNITED STATES POSTAL SERVICE NOTICE OF CLASSIFICATION CHANGE  
FOR COMPETITIVE PRODUCTS

(April 17, 2009)

In response to Order No. 200,<sup>1</sup> the Public Representative hereby comments on the April 3, 2009 United States Postal Service Notice of two minor classification changes for the competitive product Global Express Guaranteed (GXG) service (Notice). The Notice comports with the spirit and letter of title 39, and fulfills the relevant Commission Rules of Practice and Procedure. The GXG changes are both beneficial to the general public.

**Discussion**

These two changes for the Mail Classification schedule (MCS) are in fact minor, and promote more expansive, rather than restrictive, customer service for GXG.

The Commission noted in Docket No. MC2009-16 (with Order No. 186, issued March 5, 2009 [at 3]) that the Postal Service may add destinations for competitive International products under 39 CFR 3020.90 and 3020.91, “which authorize corrections to the Mail Classification Schedule.” Adding a destination country (or countries) makes

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<sup>1</sup> Notice and Order of Classification Change for Competitive Products, April 9, 2009

the Postal Service more relevant as a medium of commerce and correspondence. In the face of “streamlining” and consolidations of various customer service networks, it is refreshing to consider new opportunities for the general public to communicate in a manner that is literally more global.

Libya, the proposed additional destination country for GXG service is no new kid on the block. Since April 1952, Libya – the fourth largest country in Africa and seventeenth largest in the world – has been a member country of the Universal Postal Union. As noted in the most recent edition of the *International Mail Manual*, United States Postal Service customers can use several methods to mail items to Libya. The addition of GXG provides one more option, and an important benefit: date-certain delivery in 3 or less business days, guaranteed.

### **Less is More**

Changing the minimum dimensional requirements for GXG service in MCS section 2205.2 will allow mailpieces smaller than the current minimum dimensions to be accepted as long as the shipping label fits on the face of the mail piece. Size – length, width and girth – matters. Like weight, it is an indispensable component of mailing eligibility. GXG service requires the mailer to affix postage and a plastic pouch for the Global Express Guaranteed Air Waybill/Shipping Invoice (shipping label). The shipping label is approximately 5.5 inches high and 9.5 inches long, and the plastic pouch that carries it is approximately 7 inches high and 12 inches long. *International Mail Manual*,

216.5. For the convenience of mailers, the Postal Service will accept GXG packages which are somewhat smaller, as long as the shipping label fits on the face of the mailpiece. The adhesive pouch for the shipping label may be wrapped around the mailpiece, as long as the label is entirely legible on its face. It is laudable when a government agency will abandon bureaucratic protocols and respond to concerns for customer convenience.

In a Commission field hearing on Regulations to Establish a System of Ratemaking, Hallmark Cards, Inc. Vice-Chairman, President and CEO Donald J. Hall, Jr. noted the Postal Service “could effectively ... encourage mail consumption,” by focusing on customer preferences rather than mailing requirements for current technology.

And we think that the consumer does want a choice. They do want color envelopes. They do like different shaped envelopes. And so long as the technology can read it and the needs could be met, that would be helpful, and not limiting the range of choice, which we think is very important, particularly for the citizen mailer who *is* making a discretionary decision as to whether they want this particular Postal System around.

Docket No. RM2007-1, June 22, 2007 *Transcript*, at 82

Community Publications, Inc. Vice President David Berry amplified this sentiment; “Let's make the equipment fit the mail instead of constantly making the mail have to fit the Post Office.”*Ibid*, at 77.

The general public is gratified when, as in this case, the Postal Service, listens and accedes to customers' interests.

## **Conclusion**

The Public Representative submits that the present Notice of Classification Change complies with title 39 and the Postal Service Notice fulfills all relevant requirements for Commission Rules of Practice and Procedure.

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

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