

Before the
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Conforming Mail Classification Schedule Changes
For Market Dominant Products (Inbound Surface
Parcel Post (at UPU Rates) and Country Group
Assignment)

Docket No. MC2010-8

PUBLIC REPRESENTATIVE COMMENTS IN RESPONSE TO
UNITED STATES POSTAL SERVICE NOTICE OF CLASSIFICATION CHANGES
FOR INTERNATIONAL MAIL

(November 17, 2009)

In response to Order No. 334,¹ the Public Representative hereby comments on the November 4, 2009 United States Postal Service Notice of Classification Changes (Notice). The Notice advances the spirit and complies with requirements of title 39, and comports with relevant Commission Rules of Practice and Procedure. Accordingly, the changes benefit the general public.

The Postal Service notes that both changes will align with classification changes in Docket No. CP2010-8. That Docket (which remains open until the close of business November 23, 2009) will examine pricing, cost coverage and other issues. The analysis in this Docket, MC2010-8 focuses solely on two minor classification changes approved by the Postal Service Board of Governors (Governors' Decision No. 09-13) and filed with the Commission.²

¹ Notice and Order Concerning Classification Change and Country Group Assignment, November 9, 2009.

² See Docket No. CP2010-8, Notice of the United States Postal Service of Changes in Rates of General Applicability for Competitive Products Established In Governors' Decision No. 09-13, November 4, 2009.

Discussion

This notice concerns two issues: First, establishing a new a single maximum dimension for both rectangular and non-rectangular pieces for expedited international mailings. Second, the country rate group for Kosovo is established. Its country group assignment corresponds to that for Serbia.

In the first instance, a uniform maximum dimension would serve to simply calculations for all involved. In the Postal Service's proposed update for the Mail Classification Schedule (MCS), the new maximum size would apply to both outbound and inbound International Expedited Services (see pp. 66-77 of 78, Attachment to Governors' Decision 09-13, September 25, 2009). This would establish one standard for maximum dimensions for all international parcel post services. Postal acceptance personnel in postal administrations worldwide should benefit from this simplification. Likewise, one standard for maximum dimensions will better serve postal customers, rather than having to negotiate varying dimension limits as well as all of the other requirements for international mailings. Small businesses [see 36 U.S.C. 3642(3)(C)] are likely to benefit from this reasonable approach.

In the second instance, the market dominant country group assignment for Kosovo would be established in accordance with the existing country group assignments for Serbia. Kosovo seceded from Serbia in February 2008. Since then, more than 60 countries, including the United States and all but five [European Union](#) members have recognised Kosovo's independence. Governors' Decision 09-13

provides that for market dominant First-Class Mail International service, Kosovo would be assigned to country group 5 for First-Class Mail International service

In both instances, the classification changes would take effect at 12:01 a.m., January 4, 2010.

This Notice is consistent with the policies of title 39, in particular, section 3642, with regard to changes in the Mail Classification List (MCL), notice and publication.

Conclusion

The Public Representative submits that the present Notice of Classification Change(s) complies with title 39 and the Postal Service Notice fulfills all relevant requirements for Commission Rules of Practice and Procedure. The changes therein benefit customers of the United States Postal Service and the general public.

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

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