

**BEFORE THE  
POSTAL REGULATORY COMMISSION**

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**COMPETITIVE PRODUCTS PRICE CHANGES  
RATES OF GENERAL APPLICABILITY**

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**Docket No. CP2010-8**

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**COMMENTS OF UNITED PARCEL SERVICE ON  
NOTICE OF THE UNITED STATES POSTAL SERVICE  
OF CHANGES IN RATES OF GENERAL APPLICABILITY  
FOR COMPETITIVE PRODUCTS  
(November 23, 2009)**

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In response to Commission Order No. 333 (November 6, 2009), United Parcel Service ("UPS") hereby comments on the Notice of the United States Postal Service of Changes in Rates of General Applicability for Competitive Products (November 4, 2009) ("Notice").

UPS has no comment on the merits of the planned rate changes. However, we commend the Postal Service for publicly disclosing projected volumes and revenues, before and after the rate changes, for each product. See Notice.

The Postal Service's proactive disclosure of projected volumes and revenues by product shows good faith by the Postal Service in moving towards the increased transparency required by PAEA. This is also reflected in the Postal Service's recent decisions to disclose publicly, as was done before PAEA, actual revenue, pieces, and weight information for individual competitive products, as well as the estimated impact of a proposed cost methodology change on individual competitive products. See Letter

from Daniel J. Foucheaux, Jr. transmitting Third Quarter Revenue, Pieces, and Weight data to Commission (September 29, 2009); Docket No. RM2010-1, Petition of the United States Postal Service (Proposal 20) (October 6, 2009).

UPS encourages the Postal Service to continue this move toward achieving the transparency required by PAEA by publicly reporting cost and cost coverage contribution information for each individual competitive product in its upcoming FY2009 Annual Compliance Report. Without this information, interested parties cannot independently evaluate the Postal Service's compliance with Section 3633(a), and are therefore effectively excluded from participation in the Annual Compliance Review process.

Respectfully submitted,

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