

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

COMPETITIVE PRODUCT PRICES  
GLOBAL PLUS 2 CONTRACTS (MC2008-7)  
NEGOTIATED SERVICE AGREEMENTS

Docket No.  
CP2009-49

**NOTICE OF THE UNITED STATES POSTAL SERVICE OF FILING MODIFICATION  
TO GLOBAL PLUS 2 NEGOTIATED SERVICE AGREEMENT AND APPLICATION  
FOR NON-PUBLIC TREATMENT OF MATERIALS FILED UNDER SEAL**

(February 16, 2010)

In Order No. 268, the Commission completed its initial review of the Global Plus 2 Contract that is the subject to this docket.<sup>1</sup> Attached to this notice is a modification to that contract. The modification replaces the existing Exhibit A to Annex 1, and includes some minor revisions to Annex 1 of the contract. The modification does not give rise to any rate changes; consequently, no supporting financial information is filed in conjunction with this notice. A redacted version is filed publicly as Attachment 1, while the unredacted version of the modification is filed under seal. An application for non-public treatment is attached to this notice as Attachment 2.

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<sup>1</sup> Order No. 268, Order Concerning Filing of a Functionally Equivalent Global Plus 2 Contract Negotiated Service Agreement, Docket No. CP2009-49, July 31, 2009, at 7.

Respectfully submitted,

UNITED STATES POSTAL SERVICE  
By its attorneys:

Anthony F. Alverno  
Chief Counsel, Global Business

Christopher C. Meyerson

475 L'Enfant Plaza, S.W.  
Washington, D.C. 20260-1137  
(202) 268-7820; Fax -6187  
christopher.c.meyerson@usps.gov  
February 16, 2010

**MODIFICATION ONE TO THE  
GLOBAL CUSTOMIZED MAIL AGREEMENT BETWEEN  
THE UNITED STATES POSTAL SERVICE AND**

This Modification amends the Global Customized Mail Agreement between [REDACTED] ("Mailer") with offices at [REDACTED] and the United States Postal Service ("USPS"), an independent establishment of the Executive Branch of the United States Government, with offices at 475 L'Enfant Plaza SW, Washington, DC 20260-9998, signed by the Mailer on June 17, 2009, and by the USPS on June 18, 2009, pursuant to Article 27 of that Agreement. The Mailer and the USPS may be referred to individually as a "Party" and together as the "Parties."

This Modification is effective thirty (30) days from the date of the second signature on the Modification, contingent upon any and all necessary approvals as set forth in Article 27 of that Agreement.

The Mailer acknowledges that the Modification and supporting documentation will be filed with the Postal Regulatory Commission ("Commission") in a docketed proceeding (CP2009-49). The Mailer authorizes the USPS to determine the scope of information that must be made publicly available in any Commission docketed proceeding. The Mailer further understands that any unredacted portion of the Modification or supporting information will be available on the Commission's public website, <http://www.prc.gov>. The Mailer has the right, in accordance with the Commission's rules, to address its confidentiality concerns directly with the Commission. The procedure for making an application to the Postal Regulatory Commission for non-public treatment of materials believed to be protected from disclosure is found at Title 39, Code of Federal Regulations, Section 3007.22 found on the Commission's website, <http://www.prc.gov/Docs/63/63467/Order225.pdf>.

In Annex 1, the section with the title "Availability" shall be replaced by the following:

**Availability**

GBE service is available from the New Jersey International and Bulk Mail Center to the countries listed in Exhibit A as having a destination rate group.

In Annex 1, the first sentence of the section with the title "E. GBE M-bags" shall be replaced by the following sentence:

Subject to the provisions of IMM 260 GBE M-bags may be sent to all destination countries that are referenced in Exhibit A to this Annex as having a destination rate group.

In addition, in Annex 1, the existing Annex 1 Exhibit A, Global Bulk Economy (GBE) Country List shall be replaced by the Annex 1 Exhibit A, Global Bulk Economy (GBE) Country List which follows the signature page of this Modification.

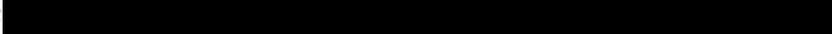
The Parties may execute this Modification in one or more counterparts (including by facsimile or by electronic means such as .pdf format). Not all Parties need be signatories to the same document. All counterpart signed documents shall be deemed an original and one instrument.

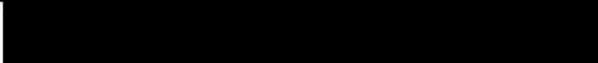
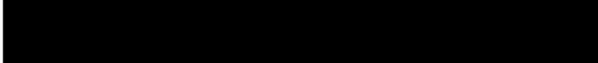
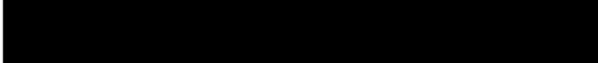
All other terms and conditions of the Agreement shall remain in force.

In witness whereof, this Agreement is deemed executed on the latter of the two dates accompanying the Parties' signatures.

**ON BEHALF OF THE UNITED STATES POSTAL SERVICE:**

Signature: Frank A. Cebello  
Name: Frank A. Cebello  
Title: Executive Director, Global Business Management  
Date: 2/1/10

**ON BEHALF OF** 

Signature:   
Name:   
Title:   
Date: 2-1-10

**ANNEX 1**  
**EXHIBIT A****GLOBAL BULK ECONOMY (GBE) COUNTRY LIST****NEW JERSEY INTERNATIONAL AND BULK MAIL CENTER (NJIBMC)**

<b>COUNTRY</b>	<b>DESTINATION EXCHANGE OFFICE CODE</b>	<b>OBSERVATIONS</b>	<b>RATE GROUP</b>
ALBANIA	TIA		5
ANDORRA		Include with Spain.	1
ANGOLA	LAD		5
ANTIGUA and BARBUDA	ANU	Include Redonda.	8
ARGENTINA	BUE		2
ARMENIA	EVN		5
ARUBA	AUA		2
ASCENSION ISLAND		Include with Great Britain.	1
AUSTRALIA	SYD		7
AUSTRIA	VIE		1
AZERBAIJAN	BAK		5
AZORES		Include with Portugal.	1
BAHAMAS	NAS		8
BALEARIC ISLANDS		Include with Spain	1
BANGLADESH	DAC		6
BARBADOS	BGI		8
BELGIUM	ANR		4
BELIZE	BZE		8
BENIN	COO	Service Suspended	5
BERMUDA	BDA		8
BHUTAN		Include with India	3
BONAIRE		Include with Netherlands Antilles (Willemstad).	2
BOSNIA-HERZEGOVINA	SJJ		5
BOTSWANA	GBE		5
BRAZIL	SAO		2
BRUNEI DARUSSALAM	BWN		6
BULGARIA	SOF		5
BURKINA FASO	OUA		5
BURMA (MAYANMAR)	RGN		6
BURUNDI	BJM		5
CAMBODIA (KAMPUCHEA)	PNH		6
CAMEROON	DLA	Service Suspended	5
CANARY ISLANDS		Include with Spain	1
CAPE VERDE	RAI		5
CAYMAN ISLANDS	GCM		8

COUNTRY	DESTINATION EXCHANGE OFFICE CODE	OBSERVATIONS	RATE GROUP
CHILE	SCL		2
CHINA (Beijing City)	BJS	Include Tibet	6
CHINA (Remainder of Country)	TSN		6
COLOMBIA	BOG		2
COMOROS	YVA		5
CONGO, DEMOCRATIC REPUBLIC OF	FIH	Service Suspended	5
COOK ISLANDS		Include with New Zealand	7
CORSICA		Include with France	1
COSTA RICA	SJO		8
CROATIA	ZAG		5
CUBA	HAV		8
CURACAO		Include with Netherlands Antilles (Willemstad).	2
CYPRUS	LMS		5
CZECH REPUBLIC	PRG		1
DENMARK	CPH	Include Faroe Islands and Greenland.	1
DJIBOUTI	JIB	Service Suspended	5
DOMINICAN REPUBLIC	SDQ		8
DUBAI		Include with United Arab Emirates.	4
ECUADOR	UIO		2
EGYPT	ALY		3
EL SALVADOR	SAL		8
ENGLAND		Include with Great Britain.	1
ERITREA	ASM	Service Suspended	5
ESTONIA	TLL		5
ETHIOPIA	ADD	Service Suspended	5
FALKLAND ISLANDS		Include with Great Britain.	1
FAROE ISLANDS		Include with Denmark.	1
FINLAND	HEL		1
FRANCE	MIM	Include Monaco	1
GABON	LBV	Service Suspended	5
GAMBIA	BJL		5
GEORGIA, REPUBLIC OF	TBS		5
GERMANY	NIA		1
GHANA	ACC		3
GIBRALTAR	GIB		4
GREAT BRITAIN & NO. IRELAND:	LAL	Include England, Scotland, Wales, Northern Ireland, Isle of Man, Jersey, Guernsey, Ascension Island, Falkland Islands, and Seychelles	1
GREECE	ATH		7
GREENLAND		Include with Denmark.	1
GUERNSEY		Include with Great Britain	1
GUATEMALA	GUA		8

COUNTRY	DESTINATION EXCHANGE OFFICE CODE	OBSERVATIONS	RATE GROUP
HAITI	PAP		8
HONDURAS	TGU		8
HONG KONG	HKG	Include Kowloon	3
HUNGARY	BUD		1
ICELAND	REK		4
INDIA	DEL	Include Bhutan.	3
INDONESIA	JKT		2
IRAN	THR		4
IRAQ	BGW	Service Suspended	4
IRELAND	AHE		1
ISLE OF MAN		Include with Great Britain	1
ISRAEL	HFA		7
ITALY	MIL	Include San Marino and Vatican City	4
JAMAICA	KIN		8
JAPAN	KWS	Include Okinawa and Ryukyu Islands	7
JERSEY		Include with Great Britain	1
JORDAN	AMM		2
KAMPUCHEA (CAMBODIA)	PHN		6
KAZAKHSTAN	ALA		6
KENYA	MBA		3
KOREA, REPUBLIC OF (SOUTH KOREA)	BUS		3
KOSOVO	PRN		5
KOWLOON		Include with Hong Kong.	3
KYRGYZSTAN	FRU		6
LAOS	VTE		6
LATVIA	RIX		5
LESOTHO	MSU		5
LIBERIA	MLW		5
LIBYA	TIP	Service Suspended	5
LIECHTENSTEIN		Include with Switzerland.	1
LITHUANIA	VNO		5
LUXEMBOURG	LUX		1
MACEDONIA	SKP		5
MADAGASCAR	TNR	Service Suspended	5
MALAWI	LBE		5
MALAYSIA	KUL		2
MALDIVES	MLE	Service Suspended	6
MALI	BKO		5
MALTA	MAR		4
MAURITIUS	MRU		5
MOLDOVA	KIV		5
MONACO		Include with France.	1
MONTENEGRO	TGD		5

COUNTRY	DESTINATION EXCHANGE OFFICE CODE	OBSERVATIONS	RATE GROUP
MOROCCO	TNG	Service Suspended	5
MOZAMBIQUE	MPM		5
MYANMAR (BURMA)	RGN		6
NAMIBIA	WDH		5
NEPAL	KTM		6
NETHERLANDS	RTM		1
NETHERLANDS ANTILLES (PHILIPSBURG)	SXM	Include Saba, St. Eustatius, & St. Maarten	2
NETHERLANDS ANTILLES (WILLEMSTAD)	CUR	Include Bonaire and Curacao.	2
NEW CALEDONIA	NOU	Include Wallis and Futuna Islands	6
NEW ZEALAND	AKL	Include Pitcairn Island, Niue Islands, Cook Islands, and Ross Dependency	7
NICARAGUA	MGA		8
NIGER	NIM		5
NIGERIA	LOS		3
NIUE ISLANDS		Include with New Zealand.	7
NORTHERN IRELAND		Include with Great Britain.	1
NORWAY	OSL		4
OKINAWA		Include with Japan.	7
PAKISTAN	KHI	Service Suspended	3
PANAMA	ONX		8
PERU	LIM		2
PHILIPPINES	MNL		2
PITCAIRN ISLAND		Include with New Zealand.	7
POLAND	WAW		1
PORTUGAL	LIS	Include Azores, Sao Tome and Principe.	1
REDONDA		Include with Antigua and Barbuda.	8
REUNION	RUN	Service Suspended	5
ROMANIA	CND		5
ROSS DEPENDENCY		Include with New Zealand.	7
RUSSIA	MOW		6
RYUKYU ISLANDS		Include with Japan.	7
SABA		Include with Netherlands Antilles (Philipsburg).	2
ST. CHRISTOPHER (ST. KITTS) AND NEVIS	BAS		8
ST. EUSTATIUS		Include with Netherlands Antilles (Philipsburg).	2
ST. HELENA		Include with South Africa	3
ST. MAARTEN		Include with Netherlands Antilles (Philipsburg).	2
ST. VINCENT AND THE GRENADINES	KTN		8
SAN MARINO		Include with Italy.	4
SAO TOME AND PRINCIPE		Include with Portugal	1
SAUDI ARABIA	DMM		4

COUNTRY	DESTINATION EXCHANGE OFFICE CODE	OBSERVATIONS	RATE GROUP
SCOTLAND		Include with Great Britain	1
SENEGAL	DKR		5
SERBIA	BEG		5
SEYCHELLES		Include with Great Britain	1
SINGAPORE	SIN		3
SLOVENIA	LJU		4
SOUTH AFRICA	CPT	Include Transkei, St, Helena, and Tristan da Cunha.	3
SPAIN	BCN	Include Andorra, Canary Islands, and Balearic Islands.	1
SRI LANKA	CMB		3
SUDAN	KRT		5
SURINAME	PBM		2
SWAZILAND	MTS		5
SWEDEN	MMA		1
SWITZERLAND	ZRH	Include Liechtenstein.	1
SYRIAN ARAB REPUBLIC (SYRIA)	DAM		4
TAIWAN	TPE		3
TAJIKISTAN	DYU		6
TANZANIA	DAR	Include Zanzibar.	3
THAILAND	BKK		3
TIBET		Include with China.	6
TRANSKEI		Include with South Africa.	3
TRINIDAD AND TOBAGO	POS		8
TRISTAN DA CUNHA		Include with South Africa.	3
TUNISIA	TUN	Service Suspended	5
TURKEY	IST		5
TURKMENISTAN	ASB		6
UGANDA	EBB		5
UKRAINE	JEV		5
UNITED ARAB EMIRATES	DXB	Include Dubai	4
UNITED KINGDOM		See Great Britain.	1
URUGUAY	MVD		2
UZBEKISTAN	TAS		6
VATICAN CITY		Include with Italy	4
VENEZUELA	CCS		8
VIETNAM	SGN		3
WALES		Include with Great Britain.	1
WALLIS AND FUTUNA ISLANDS		Include with New Caledonia.	6
YEMEN	SAH		4
ZAMBIA	LUN		5
ZANZIBAR		Include with Tanzania.	3
ZIMBABWE	BUQ		5

**RATE GROUP 1**

ANDORRA  
ASCENSION ISLAND  
AUSTRIA  
AZORES  
BALEARIC ISLANDS  
CANARY ISLANDS  
CORSICA  
CZECH REPUBLIC  
DENMARK  
ENGLAND  
FALKLAND ISLANDS  
FAROE ISLANDS  
FINLAND  
FRANCE  
GERMANY  
GREAT BRITAIN & NO. IRELAND:  
GREENLAND  
GUERNSEY  
HUNGARY  
IRELAND  
ISLE OF MAN  
JERSEY  
LIECHTENSTEIN  
LUXEMBOURG  
MONACO  
NETHERLANDS  
NORTHERN IRELAND  
POLAND  
PORTUGAL  
SAO TOME AND PRINCIPE  
SCOTLAND  
SEYCHELLES  
SPAIN  
SWEDEN  
SWITZERLAND  
UNITED KINGDOM  
WALES

**RATE GROUP 2**

ARGENTINA  
ARUBA  
BONAIRE  
BRAZIL  
CHILE  
COLOMBIA  
CURACAO  
ECUADOR  
INDONESIA  
JORDAN  
MALAYSIA  
NETHERLANDS ANTILLES (PHILIPSBURG)  
NETHERLANDS ANTILLES (WILLEMSTAD)  
PERU  
PHILIPPINES  
SABA  
ST. EUSTATIUS  
ST. MAARTEN  
SURINAME  
URUGUAY

**RATE GROUP 3**

BHUTAN  
EGYPT  
GHANA  
HONG KONG  
INDIA  
KENYA  
KOREA, REPUBLIC OF (SOUTH KOREA)  
KOWLOON  
NIGERIA  
PAKISTAN (service suspended)  
ST. HELENA  
SINGAPORE  
SOUTH AFRICA  
SRI LANKA  
TAIWAN  
TANZANIA  
THAILAND  
TRANSKEI  
TRISTAN DA CUNHA  
VIETNAM  
ZANZIBAR

**RATE GROUP 4**

BELGIUM  
DUBAI  
GIBRALTAR  
ICELAND  
IRAN  
IRAQ (service suspended)  
ITALY  
MALTA  
NORWAY  
SAN MARINO  
SAUDI ARABIA  
SLOVENIA  
SYRIAN ARAB REPUBLIC (SYRIA)  
UNITED ARAB EMIRATES  
VATICAN CITY  
YEMEN

**RATE GROUP 5**

ALBANIA  
ANGOLA  
ARMENIA  
AZERBAIJAN  
BENIN (service suspended)  
BOSNIA-HERZEGOVINA  
BOTSWANA  
BULGARIA  
BURKINA FASO  
BURUNDI  
CAMEROON (service suspended)  
CAPE VERDE  
COMOROS  
CONGO, DEMOCRATIC REPUBLIC OF  
(service suspended)  
CROATIA  
CYPRUS  
DJIBOUTI (service suspended)  
ERITREA (service suspended)  
ESTONIA  
ETHIOPIA (service suspended)  
GABON (service suspended)  
GAMBIA  
GEORGIA, REPUBLIC OF  
KOSOVO  
LATVIA

LESOTHO  
LIBERIA  
LIBYA (service suspended)  
LITHUANIA  
MACEDONIA  
MADAGASCAR (service suspended)  
MALAWI  
MALI  
MAURITIUS  
MOLDOVA  
MONTENEGRO  
MOROCCO (service suspended)  
MOZAMBIQUE  
NAMIBIA  
NIGER  
REUNION (service suspended)  
ROMANIA  
SENEGAL  
SERBIA  
SUDAN  
SWAZILAND  
TUNISIA (service suspended)  
TURKEY  
UGANDA  
UKRAINE  
ZAMBIA  
ZIMBABWE

**RATE GROUP 6**

BANGLADESH  
BRUNEI DARUSSALAM  
BURMA (MAYANMAR)  
CAMBODIA (KAMPUCHEA)  
CHINA (Beijing City)  
CHINA (Remainder of Country)  
KAMPUCHEA (CAMBODIA)  
KAZAKHSTAN  
KYRGYZSTAN  
LAOS  
MALDIVES (service suspended)  
MYANMAR (BURMA)  
NEPAL  
NEW CALEDONIA  
RUSSIA  
TAJIKISTAN  
TIBET  
TURKMENISTAN  
UZBEKISTAN  
WALLIS AND FUTUNA ISLANDS

**RATE GROUP 7**

AUSTRALIA  
COOK ISLANDS  
GREECE  
ISRAEL  
JAPAN  
NEW ZEALAND  
NIUE ISLANDS  
OKINAWA  
PITCAIRN ISLAND  
ROSS DEPENDENCY  
RYUKYU ISLANDS

**RATE GROUP 8**

ANTIGUA and BARBUDA  
BAHAMAS  
BARBADOS  
BELIZE  
BERMUDA  
CAYMAN ISLANDS  
COSTA RICA  
CUBA  
DOMINICAN REPUBLIC  
EL SALVADOR  
GUATEMALA  
HAITI  
HONDURAS  
JAMAICA  
NICARAGUA  
PANAMA  
REDONDA  
ST. CHRISTOPHER (ST. KITTS) AND NEVIS  
ST. VINCENT AND THE (GRENADINES)  
TRINIDAD AND TOBAGO  
VENEZUELA

**SERVICE NOT AVAILABLE**

AFGHANISTAN	MACAU
ALGERIA	MARTINIQUE
ANGUILLA	MAURITANIA
BAHRAIN	MONGOLIA
BELARUS	MONTSERRAT
BOLIVIA	NAURU
BRITISH VIRGIN ISLANDS	OMAN
CENTRAL AFRICAN REPUBLIC	PAPUA NEW GUINEA
CHAD	QATAR
CONGO, REPUBLIC OF THE (BRAZZAVILE)	RWANDA
COTE D'IVOIRE	SAINT BARTELEMY
DOMINICA	SAINT LUCIA
EQUATORIAL GUINEA	SAINT MARTIN
FIJI	SANTA CRUZ ISLANDS
FRENCH POLYNESIA	SIERRA LEONE
GRENADA	SLOVAKIA
GUADELOUPE	SOLOMON ISLANDS
GUINEA	SOMALIA
GUINEA-BISSAU	TOGO
GUYANA	TONGA
KOREA, DEMOCRATIC PEOPLE'S REPUBLIC OF (NORTH)	TURKS AND CAICOS ISLANDS
KUWAIT	TUVALU
LEBANON	VANUATU
	WESTERN SAMOA

**SERVICE SUSPENDED**

BENIN  
CAMEROON  
CONGO, DEMOCRATIC REPUBLIC OF  
DJIBOUTI  
ERITREA  
ETHIOPIA  
GABON  
IRAQ  
LIBYA  
MALDIVES  
MADAGASCAR  
MOROCCO  
PAKISTAN  
REUNION  
TUNISIA

## ATTACHMENT 2

### APPLICATION OF THE UNITED STATES POSTAL SERVICE FOR NON-PUBLIC TREATMENT OF MATERIALS

In accordance with 39 C.F.R. § 3007.21 and Order No. 225,<sup>1</sup> the United States Postal Service (Postal Service) hereby applies for non-public treatment of certain materials filed with the Commission in this docket. The materials pertain to a modification of a Global Plus 2 contract. The modification is being filed separately under seal with the Commission.<sup>2</sup>

The Postal Service hereby furnishes the justification required for this application by 39 C.F.R. § 3007.21(c) below.

**(1) The rationale for claiming that the materials are non-public, including the specific statutory basis for the claim, and a statement justifying application of the provision(s);**

Information of a commercial nature, which under good business practice would not be publicly disclosed, as well as third party business information, is not required to be disclosed to the public. 39 U.S.C. § 410(c)(2). The Commission may determine the appropriate level of confidentiality to be afforded to such information after weighing the nature and extent of the likely commercial injury to the Postal Service against the public interest in maintaining the financial transparency of a government establishment competing in commercial markets. 39 U.S.C. § 504(g)(3)(A).<sup>3</sup> Because the portions of

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<sup>1</sup> PRC Order No. 225, Final Rule Establishing Appropriate Confidentiality Procedures, Docket No. RM2008-1, June 19, 2009.

<sup>2</sup> The Postal Service informed the customer prior to filing its notice that it would be seeking non-public treatment of the redacted portions of the contract. The Postal Service also informed the customer that it could file its own application for non-public treatment of these materials in accordance with 39 C.F.R. § 3007.22.

<sup>3</sup> The Commission has indicated that “likely commercial injury” should be construed broadly to encompass other types of injury, such as harms to privacy, deliberative process, or law enforcement

materials filed non-publicly in this docket fall within the scope of information not required to be publicly disclosed, the Postal Service asks the Commission to support its determination that these materials are exempt from public disclosure and grant its application for their non-public treatment.

**(2) Identification, including name, phone number, and e-mail address for any third party who is known to have a proprietary interest in the materials, or if such an identification is sensitive, contact information for a Postal Service employee who shall provide notice to that third party;**

In the case of this modification to a Global Plus 2 contract, the Postal Service believes that the only third party with a proprietary interest in the materials is the customer with whom the contract is made. The Postal Service maintains that customer identifying information should be withheld from public disclosure. Therefore, rather than identifying the customer, the Postal Service gives notice that it has already informed the customer, in compliance with 39 C.F.R. § 3007.20(b), of the nature and scope of this filing and its ability to address its confidentiality concerns directly with the Commission. The Postal Service employee responsible for providing notice to the third party with proprietary interest in the materials filed in this docket is Mr. Christopher C. Meyerson, Attorney, 475 L'Enfant Plaza SW, Washington, D.C. 20260-1137, whose email address is christopher.c.meyerson@usps.gov, and whose telephone number is 202.268.7820.

**(3) A description of the materials claimed to be non-public in a manner that, without revealing the materials at issue, would allow a person to thoroughly evaluate the basis for the claim that they are non-public;**

With regard to the modification to a Global Plus 2 agreement filed in this docket, the redactions on page 1, and to the footers of the modification, and the signature block of the contract constitute the name or address of a postal patron whose identifying

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interests. PRC Order No. 194, Second Notice of Proposed Rulemaking to Establish a Procedure for According Appropriate Confidentiality, Docket No. RM2008-1, Mar. 20, 2009, at 11.

information may be withheld from mandatory public disclosure by virtue of 39 U.S.C. § 504(g)(1) and 39 U.S.C. § 410(c)(2).

**(4) Particular identification of the nature and extent of commercial harm alleged and the likelihood of such harm;**

If the portions of the contract that the Postal Service determined to be protected from disclosure due to their commercially sensitive nature were to be disclosed publicly, the Postal Service considers that it is quite likely that it would suffer commercial harm. Revealing customer identifying information would enable competitors to focus marketing efforts on current postal customers which have been cultivated through the efforts and resources of the Postal Service. The Postal Service considers that it is highly probable that if this information were made public, its competitors would take immediate advantage of it. The Global Plus 2 agreements include a provision allowing the mailer to terminate the contract without cause by providing at least 30 days' notice. Therefore, there is a substantial likelihood of losing the customers to a competitor that targets them with lower pricing.

**(5) At least one specific hypothetical, illustrative example of each alleged harm;**

Identified harm: Revealing customer identifying information would enable competitors to target the customers for sales and marketing purposes.

Hypothetical: The identity of the customer in this contract is revealed to the public.

Another mailer has an employee monitoring the filing of Global Plus 2 agreements and passing along the information to its sales function. The competitor's sales representatives can then quickly contact the Postal Service's customer and offer the

customer lower rates or other incentives to terminate its contract with the USPS in favor of using the competitor's services.

**(6) The extent of protection from public disclosure deemed to be necessary;**

The Postal Service maintains that the redacted portions of the materials filed non-publicly should be withheld from persons involved in competitive decision-making in the relevant market for international expedited, parcels, and bulk letter-post products (including both private sector integrators and foreign postal administrations), as well as their consultants and attorneys.

**(7) The length of time deemed necessary for the non-public materials to be protected from public disclosure with justification thereof;**

The Commission's regulations provide that non-public materials shall lose non-public status ten years after the date of filing with the Commission, unless the Commission or its authorized representative enters an order extending the duration of that status. 39 C.F.R. § 3007.30.

**(8) Any other factors or reasons relevant to support the application.**

None.

***Conclusion***

For the reasons discussed, the Postal Service asks that the Commission grant its application for non-public treatment of the identified materials.