



August 27, 2012

Dockets Section
U.S. Postal Regulatory Commission
Washington, D.C.
United States

Re: Docket No. PI2012-1; Order No. 1420, Public Inquiry on International Mail Proposals

Dear Sir:

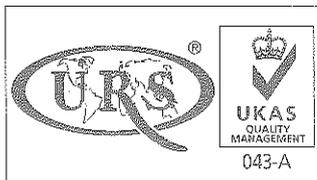
We understand that the Postal Regulatory Commission is reviewing the position of the United States in regard to the terminal dues proposals for next congress of the Universal Postal Union. This is matter that is very important to our business. We thank you for having this public inquiry.

IMX is a group of private companies which act together to provide highly specialized domestic and international postal services. IMX was established in Europe in 1988. IMX has receiving and handling centres in London, Paris, Milan, and Malaga with additional sales offices across Europe. IMX provides international mailing services for commercial mailing customers – principally publishers and large direct mail senders. IMX serves over 500 corporate customers in Europe. IMX is now the leading private provider of cross-border postal services in Europe.

In 2003, the European Commission approved a new terminal dues agreement among European post offices (REIMS II) on condition that the terminal dues would also be available to Third Party Operators if they tendered mail to post offices according to international postal standards and participated in the European system for monitoring the quality of cross-border service (UNEX). Despite this ruling, IMX found that post offices were very reluctant to grant IMX third party access. After lengthy negotiations and several threats of legal action, IMX has achieved third party access to most European post offices. We are the only European company to have such third party access.

IMX ITALY Srl

ISO 9001 CERTIFIED ORGANISATION



United Registrar of Systems Cert No. 10875

Sede Legale ed amm.va

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IMX ITALY Srl - Cap. Soc. € 98.000 - C.C.I.A.A. - R.E.A. 1407403 - Trib. di Milano - N. Reg. Imp.: 331243
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IMX now has a very good working relationships with many national post offices. We operate extraterritorial offices of exchange (ETOE) for several post offices. Because REIMS signatories provide their services within the ambit of the UPU, IMX is also recognized as a postal operator by the UPU, and as such, possesses an IMPC UPU code for each dispatching origin (FRPARI in Paris, and ITCINBA in Milan). Because of our deep knowledge of postal operations and close relationships with post offices we able to offer our customer superior international services at discounts below normal international postage rates of up to 40%.

Despite our success, we continue to find that the rules of the UPU create barriers against providing competitive services that are impossible to overcome. For example, IMX Italy operates an ETOE in Milan for Belgian Post International. This is a completely legitimate activity which competes with La Poste in outbound mail services. We cannot, however, serve the United States because the United States Postal Service refuses to deliver our mail at UPU terminal dues with UPU document. The Postal Service also refuses to allow United States Customs to process our mail using UPU customs forms. Under these conditions, it is impossible for us to compete with La Poste.

In 2007, we asked the United States Postal Service to deliver out mail at UPU terminal dues rates with UPU documentation. We pointed out that we were fully accepted by European post offices as a Third Party Operator. The Postal Service refused our request. See attached letter.

From the standpoint of global postal services, the refusal of the Postal Service to provide non-discriminatory access to U.S. postal services is a major problem. This because the United States is a major destination and because the U.S. Postal Service is leader for many other post offices.

If the United States, like the EU, could require non-discriminatory access to terminal dues, IMX and companies like IMX, could provide much improved international postal services to the United States and, some day, from the United States.

Thank you for your consideration of these points.

Yours truly,



Geoffrey Barton

CEO IMX Italy

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INTERNATIONAL PRODUCTS



June 5, 2007

Mr. Denis Cayet and Mr. Geoffrey Barton
IMX France sa
176 rue Diderot
93500 PANTIN
FRANCE

Dear Denis and Geoffrey:

This is in response to your letter of March 12, 2007 concerning access to the United States Postal Service (USPS) under domestic rates. In your letter, you requested authorization to dispatch mailings to the USPS using Universal Postal Union (UPU) documentation in view of IMX's recognition as a Third Party Postal Operator (TPO) under the REIMS Accord.

We understand IMX's role as a major participant in the international mailing industry and appreciate the business which you have brought to the USPS over the years. With the recent establishment of our Global Business Organization, we look forward to expanding our relationship by serving the needs of you and your customers in as many ways as possible. However, since the USPS is not subject to European Union legislation and is not a party to the REIMS agreement, IMX's TPO status in Europe is not recognized under regulations and requirements established by the United States Customs and Border Protection Agency and the Transportation Security Administration. These regulations limit the use of UPU documentation, as well as postal customs clearance procedures, to mail dispatched by postal operators reciprocally fulfilling government obligations under the UPU Acts. Mail from private operators as well as from ETOEs operated by public postal operators are subject to commercial documentation and clearance procedures.

Although it is not possible to accommodate your request as framed in your letter, I would like to restate our interest in continuing to work with you subject to the limits of US regulations and federal requirements. Please let me know if I can be of additional assistance.

Best regards,

Barry E. Burns
Global Business

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