

DOCKET SECTION

ORDER NO. 1238

APR 21 2 59 PM '99

UNITED STATES OF AMERICA
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Before Commissioners: Edward J. Gleiman, Chairman
W.H. "Trey" LeBlanc III
Commissioners Dana B. Covington, Sr.,
Ruth Y. Goldway, and George A. Omas

International Mail Report

Docket No. IM99-1

ORDER APPROVING REQUESTED ACCESS TO
GLOBAL PACKAGE LINK DATA

(Issued April 21, 1999)

On April 9, 1999, the Commission issued Order No. 1236, requesting additional data with which to prepare the report on the costs, volumes, and revenues of international mail services required by 39 U.S.C. § 3663. In item no. 8, the Commission requested the Postal Service to provide the data for the Global Package Link (GPL) model and the model itself. On April 14, 1999, the Commission received the Preliminary Response of the United States Postal Service to Item 8 of Order No. 1236 ("Response"). In that Response, at 1, the Postal Service states that

a very few customers account for most of the [GPL] volume. It would not be possible for the Postal Service to give the Commission the data it is requesting without divulging the identity of these customers and the volumes they send to each country. This information is proprietary to these customers and is considered by them to be a trade secret.

For this reason, the Postal Service proposes that it not relinquish custody of the GPL data and model. Instead, it proposes that the Commission examine the GPL data and model at Postal Service headquarters. According to the Response, at 2

[t]his would allow the Commission to have access to the relevant data but the data would not leave Postal Service custody. Postal Service personnel would be available to answer any questions the Commission might have about either the data or the model, and to walk the Commission through the operation of the model. In this manner the Postal Service would not have to divulge customer information that is proprietary, but the Commission would have access to all of the information it may believe it needs to understand and evaluate the Postal Service's procedures and to prepare its report.

The Postal Service states that the GPL data and model would be available for review beginning on Friday, April 16, 1999. Response at 3.

The Commission is willing to cooperate with the unusual procedures that the Postal Service proposes as a starting point in its evaluation of the accuracy of the Postal Service's estimates of the costs, volumes, and revenues of GPL service. The Postal Service's concern is not unreasonable: that the volumes of GPL mail sent by specific customers to specific countries could be inferred from GPL input data, and that GPL customers regard this customer- and country-specific data as commercially sensitive. The Commission is quite capable of providing protective conditions that maintain the confidentiality of commercially sensitive data, as the Service knows, since it has often provided data to the Commission under such circumstances. However, the Postal Service has offered this procedure as an alternative to it "generating new copies of the data and the model to give to the Commission," Response at 2, and the prospect of rapid access and assistance justifies acceptance of its proposal.

It is hoped that the Postal Service's explanations of the GPL data and model will enable the Commission to adequately evaluate the accuracy of GPL costs, volumes, and revenues without having custody of the data. If, after trying these procedures, the Commission concludes that performing its evaluation of GPL costs, volumes, and revenues off-site is impractical or ineffective because of the nature of the GPL data and model, it will ask the Postal Service to provide the required information under protective conditions similar to those that customarily apply in Commission record proceedings.

Accordingly, the Commission will direct its technical staff and Postal Service technical personnel to arrange a meeting at their earliest mutual convenience for an examination of the GPL data and model.

It is ordered:

At this time the Postal Service is excused from its obligation under Order No. 1236 to submit a response to Item No. 8.

By the Commission

(S E A L)

A handwritten signature in black ink, reading "Margaret P. Crenshaw". The signature is written in a cursive, flowing style.

Margaret Crenshaw
Secretary