

BEFORE THE
POSTAL REGULATORY COMMISSION

Market Dominant Product Prices Inbound :
Market Dominant Multi-Service Agreements :
with Foreign Postal Operators 1 :
Docket No. R2015-6

China Post Group—United States Postal
Service Multi-Product Bilateral Agreement
(MC2010-35) Negotiated Service Agreement

MOTION OF UNITED PARCEL SERVICE FOR LATE
ACCEPTANCE OF COMMENTS
(September 18, 2015)

United Parcel Service, Inc. (“UPS”), hereby moves for late acceptance of its Comments in response to Order No. 2669.¹ Order 2669 established September 17, 2015 as the deadline for comments. However, on September 16, 2015, it was announced that the Postal Service had signed a Memorandum of Understanding with Cainiao, the logistics affiliate of Alibaba Group Holding Limited, “to capitalize on growing opportunities in cross-border e-commerce between China and America by making it easier and more efficient for Chinese companies to sell and deliver goods directly to U.S. consumers.”²

Since it is likely that the Alibaba agreement will vastly increase China-to-U.S. e-commerce volumes, the Alibaba agreement has significant ramifications for the

¹ Order No. 2669, Notice and Order Concerning Type 2 Rate Adjustment and Functionally Equivalent Agreement (Aug. 17, 2015).

² China’s Alibaba and USPS Sign Deal to Increase Cross-border Logistics Services (Sept. 16, 2015), www.businesswire.com/news/home/20150916005594/en/Cainiao-United-States-Postal-Service-Sign-Memorandum.

proposed agreement between the Postal Service and China Post. UPS considered that its comments would be incomplete unless UPS addressed the combined effect of these two agreements, which necessitated additional time to prepare its comments. UPS believes that no party will be prejudiced by the short delay in filing its comments, and requests that the Commission accept this late submission.

Respectfully submitted,

UNITED PARCEL SERVICE, INC.,

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