

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

Competitive Product Prices  
Global Expedited Package Services Contracts  
Non-Published Rates

Docket No. MC2017-105

Competitive Product Prices  
Global Expedited Package Services Contracts  
Non-Published Rates 12 (MC2017-105)

Docket No. CP2017-152

PUBLIC REPRESENTATIVE COMMENTS ON  
POSTAL SERVICE REQUEST TO ADD GLOBAL EXPEDITED PACKAGE  
SERVICES–NON-PUBLISHED RATES CONTRACT 12 TO THE COMPETITIVE  
PRODUCT LIST

(April 10, 2017)

The Public Representative hereby provides comments pursuant to the Commission's Notice in this docket.<sup>1</sup> In that Notice, the Commission established the above referenced docket to receive comments from interested persons, including the undersigned Public Representative, on a Postal Service request to add Global Expedited Package Services–Non-Published Rates Contract 12 (GEPS–NPR 12).<sup>2</sup>

The GEPS–NPR 12 product offers incentive pricing to mailers that contract with the Postal Service to mail merchandise and other items to foreign destinations using Priority Mail Express International (PMEI), Priority Mail International (PMI), First-Class Package International Service (FCPIS), and Global Express Guaranteed (GXG) with the exception of PMEI Flat Rate items and PMI Flat Rate items. Attachment 2C, at 1. In

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<sup>1</sup> Notice Initiating Docket(s) for Recent Postal Service Negotiated Service Agreement Filings, April 3, 2017 (Notice).

<sup>2</sup> Request of the United States Postal Service to Add Global Expedited Package Services - Non-Published Rates 12 (GEPS - NPR 12) to the Competitive Products List and Notice of Filing GEPS - NPR 12 Model Contract and Application for Non-Public Treatment of Materials Filed Under Seal, March 31, 2017 (Request).

addition, each GEPS–NPR 12 customer contract will include prices for International Merchandise Return Service (IMRS). *Id.*

The Postal Service asks that the Commission add the GEPS–NPR 12 product to the competitive product list to reflect the change in non-generally applicable rates for this competitive product. Request. at 9.

## COMMENTS

The Public Representative has reviewed the Postal Service’s Request, the GEPS–NPR 12 model contract, and the new financial model filed under seal. Based upon that review, the Public Representative concludes that the GEPS–NPR 12 product should be added to the competitive product list. In addition, it appears that the discounted prices developed from the financial model should generate sufficient revenues to cover costs and satisfy 39 U.S.C. § 3633.

39 U.S.C. § 3633. Pursuant to 39 U.S.C. § 3633(a), the Postal Service’s competitive prices must not result in the subsidization of competitive products by market dominant products; ensure that each competitive product will cover its attributable costs; and, ensure that all competitive products collectively contribute an appropriate share of the institutional costs of the Postal Service. Based upon a review of the financial model filed under seal with the Postal Service’s Request, it appears the discounted prices developed from the financial model should generate sufficient revenues to permit the GEPS–NPR 12 product to cover costs and thereby satisfy section 3633(a).

The Public Representative respectfully submits the foregoing comments for the Commission’s consideration.

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