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

COMPETITIVE PRICE AND CLASSIFICATION CHANGES

Docket No. CP2023-113

# USPS NOTICE OF CHANGES IN RATES AND CLASSIFICATIONS OF GENERAL APPLICABILITY FOR FIRST-CLASS PACKAGE SERVICE

(February 10, 2023)

Pursuant to 39 C.F.R. §§ 3035.102 and 3035.104, the United States Postal Service hereby gives notice of changes in rates and classifications of general applicability for First-Class Package Service (FCPS), a competitive product. These changes flow from the Postal Service's earlier filings to expand and enhance the First-Class Package Service product, in Docket Nos. MC2022-81 and MC2022-82. Today's filing includes changes to rename the enhanced and expanded First-Class Package Service product as "USPS Ground Advantage," make some incidental classification changes, and establish prices for USPS Ground Advantage, reflecting both ouncebased and pound-based rates. Ounce-based rates will be presented in 4, 8, 12, and 15 ounce increments.

In accordance with Rule 3035.102(b) and Rule 3035.104(b), this Notice provides the Governors' Decision establishing the changes, including a statement of explanation and justification, and certification of the vote. The new prices and classification changes will take effect on July 9, 2023. Attached to this pleading is a schedule showing the price and classification changes incorporated into a draft of the revisions to the

competitive products section of the Mail Classification Schedule (MCS). Classification changes established by this Governors' Decision are shown in legislative format.

Also being filed herewith is a non-public annex showing FY 2023 projected volumes, revenues, attributable costs, contribution, and cost coverage for each product. Additionally, in accordance with Order No. 1062, the Postal Service is filing supporting forecast data and price adjustment calculations for each affected product. An application for non-public treatment of this material is attached to this pleading, along with a redacted, public version of the annex. Redacted versions of certain supporting materials are also being filed.

In accordance with Commission Order Nos. 1062 and 6249, the following is a list of the proposed classification changes made in this docket and a thorough explanation and justification for each change:

### Renaming First-Class Package Service<sup>2</sup>

The Postal Service will be renaming the expanded and enhanced First-Class Package Service product as "USPS Ground Advantage," effective July 9, 2023. As background, the First-Class Package Service product arose from a transfer of First-Class Mail parcels from the market dominant to the competitive product list. The First-Class Package Service product was generally utilized for small fulfillment parcels,

<sup>&</sup>lt;sup>1</sup> Projections for FY 2024 are not available at this time; however, the Postal Service expects it will file a subsequent competitive price change case for July 2023 in the coming months, at which time it will be able to provide FY 2024 projections for all competitive products.

<sup>&</sup>lt;sup>2</sup> The Postal Service understands that a product name change has historically been analyzed as a minor correction pursuant to 39 C.F.R. § 3040.190. See Order No. 1713, Order Approving Minor Classification Change, Docket No. MC2013-45 (May 13, 2013). However, given that this particular name change is part of a broader set of changes to the Postal Service's ground package offerings, the Postal Service herein provides additional support in accordance with 39 C.F.R. §§ 3040.180 and 181.

weighing up to 15.999 ounces. The Postal Service has determined that the First-Class Package Service brand name has, over time, become closely associated with such lightweight packages. With the upcoming expansion and enhancements to that product, the Postal Service believes a new brand name is needed that better suits a comprehensive ground package offering up to seventy pounds. Accordingly, the Postal Service performed market research on various options for a new brand name befitting this expanded ground package offering. The research indicated that the "USPS Ground Advantage" name will create an identifiable brand in the package market that is closely associated with the broader postal brand and clearly indicates the product is a strong option for customers' ground shipping needs. The Postal Service expects USPS Ground Advantage will soon become a powerful brand name in the ground package market. See 39 C.F.R. § 3040.181(a).

This classification change will not result in the violation of 39 U.S.C § 3633 or associated regulations, as the Postal Service's competitive products are still expected to cover their costs and contribute an appropriate share to institutional costs. See 39 C.F.R. § 3040.181(b)(2). Finally, the Postal Service expects this classification change will have a positive impact on existing users of the Postal Service's ground package offerings, and will have a minimal impact on competitors and the broader package market. Customers, competitors, and the broader market will all benefit from improved brand clarity. See 39 C.F.R. § 3040.181(c). For existing FCPS Negotiated Service Agreement (NSA) customers, the Postal Service plans to interpret all contractual references to FCPS as USPS Ground Advantage, in order to minimize any disruption to customers' contracts. When necessary, the Postal Service will execute amendments

with customers to clarify any contract interpretation issues. New contracts utilizing the new USPS Ground Advantage name will be executed with new customers over the coming months.

#### Certificate of Mailing and Certified Mail Removed

The Postal Service will be removing Certificate of Mailing and Certified Mail from the list of available optional features under USPS Ground Advantage. Usage of those features has been low under First-Class Package Service in recent years, and with the upcoming changes to that product, the Postal Service expects usage to continue to remain low among its ground package customers. For customers who seek to utilize those specific services, alternative products such as Priority Mail will continue to offer Certificate of Mailing and Certified Mail. See 39 C.F.R. § 3040.181(a). This classification change will not result in the violation of 39 U.S.C § 3633 or associated regulations, as the Postal Service's competitive products are still expected to cover their costs and contribute an appropriate share to institutional costs. See 39 C.F.R. § 3040.181(b)(2). Finally, the Postal Service expects this classification change will have a minimal impact on existing users, because usage is already low, and customers who desire to use Certificate of Mailing and Certified Mail will still be able to do so through alternative products. Competitors and the broader package market will all benefit from correcting this misalignment of optional features for the Postal Service's ground package offering. See 39 C.F.R. § 3040.181(c).

<u>Dimensional Weight up to Zone 9; Dimension Noncompliance Fee Added</u>

Finally, the Postal Service is making two additional minor corrections to the MCS for USPS Ground Advantage, to clarify that Dimensional Weight pricing is available up

to Zone 9, and to clarify that the Dimension Noncompliance Fee applies to the product. The Postal Service discovered these errors after it executed the filings in Docket Nos. MC2022-81 and MC2022-82, and is today providing notice of these minor corrections. See 39 C.F.R. 3040.190.

The Governors' Decision and record of proceedings will be published in the Federal Register in accordance with 39 U.S.C. § 3632(b)(2).

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

James Tucker Chief Counsel, Pricing & Product Support

Elizabeth A. Reed

475 L'Enfant Plaza, SW Washington, D.C. 20260 (202) 268-3179 Elizabeth.A.Reed@usps.gov February 10, 2023 DECISION OF THE GOVERNORS OF THE UNITED STATES POSTAL SERVICE ON CHANGES IN RATES AND CLASSIFICATIONS OF GENERAL APPLICABILITY FOR COMPETITIVE PRODUCTS (GOVERNORS' DECISION No. 23-1)

February 9, 2023

#### STATEMENT OF EXPLANATION AND JUSTIFICATION

Pursuant to authority under section 3632 of Title 39, as amended by the Postal Accountability and Enhancement Act of 2006 ("PAEA"), we establish changes in rates and classifications of general applicability for First-Class Package Service, one of the Postal Service's competitive products. The changes are described generally below, with a detailed description of the changes in the attachment. The attachment includes the draft Mail Classification Schedule sections with classification changes in legislative format.

In Governors' Decision 22-2, we established a variety of changes designed to simplify and streamline the Postal Service's ground competitive package offerings under one product, First-Class Package Service. Subsequently, in Governors' Decision 22-4, we delayed implementation of the changes and committed to implementing them this calendar year with a minimum of 30 days' notice. The changes we establish today will implement the approved changes and rename the First-Class Package Service product as "USPS Ground Advantage." The Retail and Commercial price categories will be maintained, and the Retail price category will retain its seal against inspection. USPS Ground Advantage will also include up to \$100 of insurance as well as cubic pricing tiers up to one cubic foot (1 cu. ft.). Certain additional changes are being made today, to clarify that dimensional weighting applies up to Zone 9, and to clarify that the dimension noncompliance fee applies to this product. We are also removing Certificate of Mailing and Certified Mail as available extra services that can be utilized with USPS Ground Advantage.

Rates are being established for USPS Ground Advantage, reflecting both ounce-based and pound-based rates, to take effect on July 9, 2023. These rates are designed to closely align with existing ground package rates established in January 2023. We understand that management may propose further updates to these proposed rates at our May meeting, which will be considered at that time. The Postal Service expects that its retail and commercial customers will all benefit from this consolidated ground package offering, which beginning on July 9, 2023, will be known as USPS Ground Advantage.

#### **ORDER**

The changes in rates and classes set forth herein shall be effective at 12:01 A.M. on July 9, 2023. We direct the Secretary to have this decision published in the *Federal Register* in accordance with 39 U.S.C. § 3632(b)(2) and direct management to file with the Postal Regulatory Commission appropriate notice of these changes.

By The Governors:

Roman Martinez IV

Chairman, Board of Governors

# UNITED STATES POSTAL SERVICE OFFICE OF THE BOARD OF GOVERNORS

# CERTIFICATION OF GOVERNORS' VOTE ON GOVERNORS' DECISION NO. 23-1

Consistent with 39 USC 3632(a), I hereby certify that, on February 9, 2023, the Governors voted on adopting Governors' Decision No. 23-1, and that a majority of the Governors then holding office voted in favor of that Decision.

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Michael J. Elston

Secretary of the Board of Governors

February 9, 2023

# PART B

**COMPETITIVE PRODUCTS** 

#### 2000 COMPETITIVE PRODUCT LIST

### **DOMESTIC PRODUCTS**

Priority Mail Express Priority Mail Parcel Select Parcel Return Service

First-Class Package Service USPS Ground Advantage

#### 2125 First-Class Package Service USPS Ground Advantage

#### 2125.1 Description

- a. Any mailable matter may be mailed as First-Class Package
  Service USPS Ground Advantage Commercial mail, except matter that
  meets the definition of "letter" in 39 C.F.R. § 310.1 and does not fit
  within any of the exceptions or suspensions to the Private Express
  Statutes in 39 C.F.R. Parts 310 and 320.
- b. First-Class Package Service USPS Ground Advantage Commercial mail is not sealed against postal inspection. Mailing of matter as such constitutes consent by the mailer to postal inspection of the contents, regardless of the physical closure.
- c. Any mailable matter may be mailed as First-Class Package ServiceUSPS Ground Advantage Retail mail.
- d. First-Class Package Service USPS Ground Advantage Retail mail is sealed against postal inspection and shall not be opened except as authorized by law.
- e. First-Class Package Service USPS Ground Advantage pieces that are undeliverable-as-addressed are entitled to be forwarded or returned to the sender without additional charge.
- f. Postage for First-Class Package Service USPS Ground Advantage Commercial mail must be paid for by one of the following methods:
  - Registered end-users of USPS-approved PC Postage products when using a qualifying shipping label managed by PC Postage system.
  - USPS-approved IBI postage meters that electronically transmit transactional data to the USPS.
  - o Permit imprint.
- g. Return parcels may be sent without prepayment of postage if authorized by the returns customer, who agrees to pay the postage.
- h. Up to \$100.00 of General Insurance coverage is included at no additional cost in the price of First-Class Package ServiceUSPS Ground Advantage pieces that bear an Intelligent Mail package barcode or retail tracking barcode, or for First-Class Package ServiceUSPS Ground Advantage pieces that bear an Intelligent Mail package barcode and for which the mailer pays Commercial Plus prices or uses ePostage, Electronic Verification System, Hardcopy Manifest, or an approved Manifest Mailing System.

Attachments and Enclosures

 First-Class Mail or USPS Marketing Mail pieces may be attached to or enclosed in First-Class Package Service USPS Ground Advantage mail. Additional postage may be required.

#### 2125.2 Size and Weight Limitations<sup>1</sup>

	Length	Height	Thickness	Weight		
Minimum	large enough to address, and o address side	none				
Maximum Cubic		Various, not to exceed 0.1, 0.2, 0.3, 0.4, 0.5, 0.6, 0.7, 0.8, 0.9, or 1.0 cubic feet				
All Others	130 inches in c	ombined length	and girth	70 pounds		

#### **Notes**

1. A charge of \$100.00 applies to pieces found in the postal network that exceed the 70-pound maximum weight limitation or the 130-inch length plus girth maximum dimensional limit for Postal Service products. Such items are nonmailable and will not be delivered. As described in the Domestic Mail Manual, this charge is payable before release of the item, unless the item is picked up at the same facility where it was entered.

#### 2125.3 Minimum Volume Requirements

	Minimum Volume Requirements
Commercial	none
Retail	none
Cubic	none
Limited Overland Routes	none

#### 2125.4 Price Categories

The following price categories are available for the product specified in this section:

- Commercial
  - o Zone/Weight Prices are based on weight and zone
  - o Oversized
  - o Dimensional Weight

- Retail
  - o Zone/Weight Prices are based on weight and zone
  - Oversized
  - Dimensional Weight
- Cubic
  - Zone/Cube Prices are based on cubic size and zone
- Limited Overland Routes
  - Zone/Weight Prices are based on weight and zone

#### 2125.5 Optional Features

The following additional postal services may be available in conjunction with the product specified in this section:

- Ancillary Services (1505)
  - Address Correction Service (1505.1)
  - o Business Reply Mail (1505.3)
  - Certified Mail (1505.5)
  - Certificate of Mailing (1505.6)
  - o Collect on Delivery (1505.7)
  - o USPS Tracking (1505.8)
  - o Insurance (1505.9)
  - o Registered Mail (1505.12)
  - o Return Receipt (1505.13)
  - Signature Confirmation (1505.17)
  - Special Handling (1505.18)
- Pickup on Demand Service
- Competitive Ancillary Services (2645)
  - o Adult Signature (2645.1)
  - o Package Intercept Service (2645.2)
  - Premium Data Retention and Retrieval Service (USPS Tracking Plus) (2545.3)

### 2125.6 Prices

#### Commercial

Maximum	Zone								
Weight (oz/lb)	1 (\$)	2 (\$)	3 (\$)	4 (\$)	5 (\$)	6 (\$)	7 (\$)	8 (\$)	9 (\$)
40z.	3.59	3.64	3.66	3.75	3.81	3.90	3.97	4.13	4.13
<u>402.</u> 80z.	3.99	4.06	4.09	4.15	4.20	4.24	4.31	4.44	4.44
<u>002.</u> 120z.	4.62	4.69	4.74	4.81	4.88	5.04	5.17	5.33	5.33
<u>1202.</u> 150z.	5.85	5.93	6.00	6.07	6.22	6.44	6.60	6.78	6.78
11b.	6.99	7.22	7.53	7.75	7.87	8.09	8.61	9.03	9.03
<u>110.</u> 2	7.13	7.50	7.64	7.75	8.22	9.58	10.21	10.85	10.85
3	7.13					11.19			
		7.56	7.74	8.14	8.80		11.63	12.25	12.25
4	7.29	7.66	7.98	8.65	10.11	11.70	12.54	13.17	13.17
5	7.40	7.78	8.14	8.91		12.46	13.19	13.98	13.98
6	7.58	7.89	8.50	9.40	12.27	12.77	13.55	14.32	14.32
7	8.02	8.34	9.27	9.84	12.65	13.09	14.02	15.03	15.03
8	8.16	8.49	9.84	11.20	12.97	13.58	14.50	15.62	15.62
9	8.90	9.26	10.28	11.77	13.17	13.96	15.20	16.57	16.57
10	9.35	9.72	10.80	11.94	13.59	14.38	16.22	17.83	17.83
11	11.02	11.53	11.79	12.97	14.05	15.06	17.86	19.27	19.27
12	11.55	11.95	12.39	13.21	14.33	15.70	18.66	20.26	20.26
13	11.86	12.23	12.81	13.55	14.82	16.26	20.05	21.69	21.69
14	12.24	12.54	13.10	13.62	15.08	17.29	21.41	23.21	23.21
15	12.43	12.62	13.58	14.06	15.85	18.33	22.19	24.75	24.75
16	12.74	12.88	13.91	14.20	16.03	19.01	23.19	25.50	25.50
17	13.04	13.90	14.41	14.64	16.74	19.91	24.68	26.34	26.34
18	13.11	13.97	14.52	14.80	17.46	20.84	25.25	27.97	27.97
19	13.46	14.34	15.22	15.45	18.65	21.52	26.19	29.17	29.17
20	13.69	14.59	15.54	15.85	19.16	22.33	27.23	30.58	30.58
21	14.80	15.91	16.86	17.67	21.56	25.79	31.31	35.17	35.17
22	15.90	17.09	18.29	19.70	24.26	29.79	36.01	40.44	40.44
23	17.10	18.38	19.85	21.97	27.29	34.41	41.41	46.51	46.51
24	18.38	19.76	21.53	24.49	30.70	39.74	47.62	53.48	53.48
25	19.76	21.24	23.36	27.31	34.54	45.90	54.76	61.51	61.51

# Commercial (Continued)

Maximum Weight	Zone 1	Zone 2	Zone 3	Zone 4	Zone 5	Zone 6	Zone 7	Zone 8	Zone 9
(oz/lb)	(\$)	(\$)	(\$)	(\$)	(\$)	(\$)	(\$)	(\$)	(\$)
26	22.59	24.28	27.79	35.48	45.76	57.74	67.83	77.39	77.39
27	23.96	25.76	29.07	37.67	49.93	58.54	69.55	80.27	80.27
28	24.71	26.56	29.46	38.76	51.25	59.36	71.22	83.48	83.48
29	25.48	27.39	29.77	39.82	51.94	60.38	72.90	85.84	85.84
30	26.25	28.22	30.21	40.76	52.66	62.11	74.55	87.68	87.68
31	27.01	29.04	30.51	41.41	53.34	63.03	76.24	89.72	89.72
32	27.32	29.37	31.17	42.11	53.97	63.87	77.93	91.35	91.35
33	27.75	29.83	32.05	43.17	54.69	65.14	79.58	93.24	93.24
34	28.01	30.11	32.90	44.28	55.89	66.73	81.26	95.08	95.08
35	28.33	30.45	33.68	44.92	57.09	68.55	82.93	96.55	96.55
36	28.69	30.84	34.68	45.52	58.34	70.32	84.08	98.28	98.28
37	28.99	31.16	35.33	46.18	59.39	72.20	85.19	99.96	99.96
38	29.28	31.48	36.20	46.77	60.59	74.25	86.18	101.64	101.64
39	29.57	31.79	37.07	47.31	61.86	76.04	88.52	103.22	103.22
40	29.88	32.12	37.85	47.93	63.16	77.28	90.54	104.69	104.69
41	30.21	32.48	38.49	48.45	63.72	78.61	92.52	106.37	106.37
42	30.44	32.72	38.79	48.88	64.81	80.02	93.81	107.73	107.73
43	30.80	33.11	39.08	49.32	65.89	81.97	95.00	108.89	108.89
44	31.02	33.35	39.36	49.75	66.96	83.30	96.16	110.46	110.46
45	31.22	33.56	39.65	50.20	68.05	84.24	97.22	111.83	111.83
46	31.50	33.86	39.94	50.64	69.13	85.20	98.29	113.14	113.14
47	31.73	34.11	40.23	51.07	70.21	86.10	99.44	114.50	114.50
48	32.00	34.40	40.52	51.51	71.28	87.22	100.41	115.66	115.66
49	32.26	34.68	40.79	51.95	72.37	88.44	101.48	116.81	116.81
50	32.39	34.82	41.08	52.40	73.46	89.70	102.80	118.07	118.07

# Commercial (Continued)

Maximum	Zone								
Weight (oz/lb)	1 (\$)	2 (\$)	3 (\$)	4 (\$)	5 (\$)	6 (\$)	7 (\$)	8 (\$)	9 (\$)
51	32.88	35.35	41.37	52.80	74.72	90.95	104.30	119.23	119.23
52	33.37	35.87	41.66	53.25	75.25	91.84	105.90	120.59	120.59
53	34.00	36.55	41.94	53.69	75.87	92.63	107.67	122.17	122.17
54	34.50	37.09	42.24	54.12	76.53	93.30	109.24	123.95	123.95
55	35.05	37.68	42.51	54.56	77.02	94.09	111.01	125.58	125.58
56	35.54	38.21	42.81	55.00	77.61	94.72	112.56	126.89	126.89
57	36.11	38.82	43.09	55.44	78.07	95.46	113.30	127.79	127.79
58	36.67	39.42	43.38	55.87	78.57	96.03	114.35	128.89	128.89
59	37.20	39.99	43.67	56.30	79.05	96.58	115.08	129.83	129.83
60	37.67	40.50	43.95	56.73	79.50	97.07	115.82	130.67	130.67
61	38.29	41.16	44.23	57.17	79.89	97.62	117.18	132.51	132.51
62	38.77	41.68	44.52	57.60	80.25	98.08	118.61	134.72	134.72
63	39.48	42.44	44.81	58.05	80.68	98.65	119.19	136.92	136.92
64	39.83	42.82	45.09	58.49	81.04	99.10	119.74	139.07	139.07
65	40.41	43.44	45.38	58.94	81.29	99.39	120.35	141.17	141.17
66	40.95	44.02	45.68	59.36	81.66	99.90	120.72	143.43	143.43
67	41.57	44.69	45.96	60.38	81.95	100.22	121.21	145.27	145.27
68	42.06	45.21	46.24	61.14	82.18	101.50	121.85	146.84	146.84
69	42.64	45.84	46.54	61.93	82.43	102.74	122.43	148.42	148.42
70	43.09	46.32	46.82	62.92	82.69	104.00	122.88	150.10	150.10
Oversized	84.00	90.30	106.79	129.62	152.15	174.93	197.66	220.50	220.50

Retail1

Maximum	Zone								
Weight (oz/lb)	1 (\$)	2 (\$)	3 (\$)	4 (\$)	5 (\$)	6 (\$)	7 (\$)	8 (\$)	9 (\$)
<u>4oz.</u>	4.75	4.85	4.90	5.00	5.05	5.10	5.15	5.25	5.25
<u>80z.</u>	5.40	5.50	5.55	5.60	5.65	5.70	5.75	5.85	5.85
<u>12oz.</u>	6.15	6.25	6.30	6.35	6.40	6.45	6.55	6.65	6.65
<u>15oz.</u>	7.50	7.65	7.75	7.85	7.95	8.05	8.15	8.25	8.25
<u>1lb.</u>	8.95	9.25	9.60	9.95	10.55	10.75	10.90	11.05	11.05
2	9.60	9.85	10.45	11.30	11.65	11.80	12.90	15.00	15.00
3	10.30	10.55	11.25	12.45	12.80	12.90	14.90	19.25	19.25
4	11.00	11.30	12.05	13.20	13.50	16.10	17.65	21.25	21.25
5	11.75	12.05	12.90	13.75	14.25	17.90	20.20	22.80	22.80
6	12.15	12.30	13.00	14.25	15.05	19.95	21.95	27.00	27.00
7	12.65	12.75	13.70	15.55	16.25	21.10	23.55	30.10	30.10
8	13.20	13.25	14.40	15.95	17.10	21.90	27.55	34.30	34.30
9	13.45	13.50	14.85	16.30	18.30	22.55	29.40	36.70	36.70
10	14.00	14.10	15.10	16.80	20.70	25.70	31.90	40.90	40.90
11	15.20	15.50	16.60	18.65	21.25	28.05	34.90	43.55	43.55
12	15.85	16.15	17.35	19.30	22.35	29.75	38.05	47.40	47.40
13	16.45	16.80	18.05	20.00	22.90	31.10	41.55	51.65	51.65
14	17.20	17.50	18.85	20.70	24.15	32.85	45.40	56.30	56.30
15	17.90	18.25	19.65	21.40	26.45	34.20	46.05	57.40	57.40
16	18.65	19.05	20.70	22.55	27.30	35.85	48.60	60.60	60.60
17	19.50	19.85	21.85	23.70	28.20	37.90	51.20	63.85	63.85
18	20.35	20.75	22.95	24.90	29.00	39.50	53.75	67.15	67.15
19	21.25	21.70	24.15	26.15	30.15	40.45	54.60	68.15	68.15
20	22.20	22.60	25.45	27.50	31.10	42.25	56.35	68.60	68.60
21	23.00	23.45	26.75	29.70	33.80	44.85	57.45	69.10	69.10
22	23.80	24.30	28.15	32.00	35.90	47.25	58.65	74.65	74.65
23	24.65	25.10	29.55	34.55	38.55	48.70	59.90	75.45	75.45
24	25.50	26.00	31.05	37.25	40.40	51.10	61.20	76.75	76.75
25	26.40	26.95	32.65	40.25	43.50	53.55	62.55	81.25	81.25

# Retail<sup>1</sup> (Continued)

Maximum	Zone								
Weight (oz/lb)	1 (\$)	2 (\$)	3 (\$)	4 (\$)	5 (\$)	6 (\$)	7 (\$)	8 (\$)	9 (\$)
26	28.40	28.45	34.40	43.55	53.35	63.85	74.15	84.70	84.70
27	30.15	30.20	36.00	45.00	56.05	66.70	77.10	87.75	87.75
28	31.10	31.15	36.50	46.25	57.55	68.85	79.85	91.15	91.15
29	32.05	32.15	36.85	47.35	58.40	70.20	81.90	93.65	93.65
30	33.00	33.10	37.45	48.70	59.20	71.45	83.40	95.60	95.60
31	34.05	34.10	37.80	51.25	60.10	72.80	85.15	97.80	97.80
32	34.40	34.45	38.60	52.45	60.65	73.75	86.50	99.50	99.50
33	35.00	35.05	39.60	53.80	61.50	74.95	88.05	101.50	101.50
34	35.30	35.35	40.65	55.10	62.70	76.45	89.85	103.45	103.45
35	35.65	35.75	41.70	55.80	64.05	77.90	91.30	105.00	105.00
36	36.05	36.10	42.90	56.60	65.60	79.55	93.05	106.85	106.85
37	36.35	36.45	43.60	57.45	66.70	80.85	94.60	108.65	108.65
38	36.80	36.85	44.75	58.15	68.00	82.30	96.15	110.40	110.40
39	37.20	37.30	45.75	58.90	69.45	83.80	97.80	112.10	112.10
40	37.65	37.70	46.75	59.70	70.90	85.25	99.25	113.65	113.65
41	37.95	38.00	47.65	60.40	71.60	86.35	100.75	115.45	115.45
42	38.20	38.30	48.50	61.00	73.05	87.80	102.15	116.85	116.85
43	38.75	38.80	49.30	61.55	74.65	89.25	103.50	118.10	118.10
44	39.00	39.10	50.15	62.35	76.20	90.80	105.05	119.80	119.80
45	39.25	39.35	50.65	62.75	78.00	92.50	106.70	121.20	121.20
46	39.55	39.60	51.00	63.45	79.35	93.90	108.10	122.60	122.60
47	39.90	40.00	51.45	64.05	81.30	95.65	109.70	124.00	124.00
48	40.30	40.35	51.95	64.70	82.80	97.10	111.00	125.30	125.30
49	40.50	40.55	52.25	65.15	84.25	98.55	112.30	126.50	126.50
50	40.65	40.75	52.55	65.65	85.95	100.05	113.75	127.85	127.85

### Retail<sup>1</sup> (Continued)

Maximum	Zone								
Weight (oz/lb)	1 (\$)	2 (\$)	3 (\$)	4 (\$)	5 (\$)	6 (\$)	7 (\$)	8 (\$)	9 (\$)
51	40.85	40.95	53.10	66.20	87.35	101.50	115.00	129.05	129.05
52	41.40	41.45	53.40	66.70	88.05	102.40	116.25	130.50	130.50
53	42.10	42.15	53.80	67.10	88.75	103.35	117.55	132.20	132.20
54	42.60	42.70	54.00	67.55	89.45	104.55	119.05	134.05	134.05
55	43.35	43.45	54.35	67.95	90.10	105.50	120.40	135.80	135.80
56	43.95	44.00	54.75	68.35	90.70	106.40	121.55	137.15	137.15
57	44.65	44.70	54.90	68.70	91.20	107.05	122.30	138.10	138.10
58	45.30	45.40	55.15	69.20	91.90	107.95	123.45	139.30	139.30
59	46.00	46.10	55.45	69.50	92.40	108.55	124.25	140.30	140.30
60	46.65	46.75	55.65	70.20	92.85	109.15	124.95	141.20	141.20
61	47.35	47.40	55.95	71.45	93.35	110.20	126.45	143.15	143.15
62	47.80	47.90	56.05	72.35	93.90	111.30	128.15	145.50	145.50
63	48.75	48.85	56.35	73.55	94.30	112.35	129.85	147.80	147.80
64	49.25	49.35	58.10	74.60	94.80	113.50	131.50	150.10	150.10
65	49.95	50.00	58.25	75.65	95.00	114.35	133.15	152.30	152.30
66	50.55	50.65	58.45	76.85	95.55	115.55	134.85	154.70	154.70
67	51.35	51.45	58.55	78.20	95.90	116.40	136.35	156.65	156.65
68	52.00	52.10	58.70	79.10	96.10	117.10	137.50	158.30	158.30
69	52.65	52.75	58.75	80.10	96.35	117.75	138.70	160.00	160.00
70	53.25	53.35	58.95	81.45	96.65	118.55	139.95	161.75	161.75
Oversized	89.05	91.55	113.40	137.75	161.90	186.15	209.50	233.75	233.75

#### **Notes**

1. A handling charge of \$0.01 per piece applies to foreign-origin, inbound direct entry mail tendered by foreign postal operators, subject to the terms of an authorization arrangement.

#### Domestic Products First-Class Package ServiceUSPS Ground Advantage

### Cubic

Maximum Cubic Feet	Zone 1 (\$)	Zone 2 (\$)	Zone 3 (\$)	Zone 4 (\$)	Zone 5 (\$)	Zone 6 (\$)	Zone 7 (\$)	Zone 8 (\$)	Zone 9 (\$)
0.10	6.75	6.95	7.21	7.40	7.52	7.74	8.19	8.56	8.56
0.20	7.07	7.39	7.60	7.87	8.08	8.98	9.57	10.12	10.12
0.30	7.16	7.53	7.70	8.06	8.55	10.48	11.01	11.64	11.64
0.40	7.25	7.62	7.87	8.42	9.53	11.47	12.14	12.76	12.76
0.50	7.36	7.73	8.08	8.81	10.23	12.16	12.93	13.66	13.66
0.60	7.53	7.86	8.40	9.26	11.72	12.68	13.45	14.22	14.22
0.70	7.91	8.23	9.09	9.73	12.56	13.01	13.91	14.86	14.86
0.80	8.13	8.46	9.73	10.93	12.91	13.48	14.40	15.50	15.50
0.90	8.78	9.14	10.21	11.68	13.14	13.90	15.09	16.42	16.42
1.00	9.30	9.66	10.74	11.92	13.54	14.33	16.10	17.68	17.68

#### Limited Overland Routes

Pieces delivered to or from designated intra-Alaska ZIP Codes not connected by overland routes are eligible for the following prices.

Maximum Weight (pounds)	Zone 1 (\$)	Zone 2 (\$)	Zone 3 (\$)	Zone 4 (\$)	Zone 5 (\$)
1	8.30	8.35	8.65	9.30	10.05
2	8.50	8.60	9.60	9.75	10.15
3	8.85	8.90	10.35	10.95	11.50
4	9.30	9.40	10.90	12.10	12.75
5	10.00	10.10	10.95	12.35	13.15
6	10.10	10.20	11.15	12.65	13.30
7	10.15	10.25	11.30	12.70	13.35
8	10.20	10.30	11.40	12.75	13.40
9	10.30	10.40	11.45	12.90	13.45
10	10.95	11.05	11.55	13.00	14.45
11	11.00	11.10	11.60	13.10	14.70
12	11.05	11.15	11.65	13.35	14.85
13	11.10	11.20	11.70	13.65	15.05
14	11.15	11.25	11.75	13.70	15.70
15	11.50	11.60	11.90	13.80	16.50
16	11.60	11.70	12.15	13.90	17.10
17	11.85	11.95	12.70	14.00	17.85
18	12.85	13.00	13.35	14.45	18.05
19	13.40	13.50	14.10	15.30	18.70
20	13.85	13.95	15.05	16.25	19.45
21	14.15	14.25	16.05	17.75	21.50
22	14.70	14.80	16.90	19.25	23.40
23	15.20	15.35	17.95	20.95	25.10
24	15.75	15.90	18.35	22.65	28.35
25	16.50	16.65	20.00	24.15	30.80

# Limited Overland Routes (Continued)

Maximum Weight (pounds)	Zone 1 (\$)	Zone 2 (\$)	Zone 3 (\$)	Zone 4 (\$)	Zone 5 (\$)
26	16.70	16.85	21.15	25.85	33.80
27	17.55	17.70	22.25	26.30	34.10
28	18.00	18.15	22.75	27.05	34.50
29	18.50	18.65	23.30	27.90	36.05
30	18.95	19.10	23.85	28.65	36.45
31	19.60	19.75	24.25	30.35	37.50
32	19.90	20.05	24.70	31.20	40.40
33	20.30	20.50	25.25	31.95	41.50
34	20.85	21.05	25.75	32.60	42.35
35	21.40	21.55	26.30	33.35	43.10
36	21.70	21.90	26.85	33.90	43.45
37	22.15	22.30	27.35	34.55	44.45
38	22.65	22.85	27.80	35.15	45.20
39	23.20	23.40	28.35	35.80	46.05
40	23.60	23.80	28.85	36.35	46.80
41	24.15	24.35	29.40	37.20	47.35
42	24.45	24.70	29.95	37.95	48.20
43	24.90	25.10	30.45	38.50	49.15
44	25.30	25.55	31.00	39.15	49.45
45	25.65	25.85	31.45	39.75	49.80
46	26.05	26.30	31.85	40.40	50.15
47	26.40	26.60	32.40	41.05	50.25
48	26.70	26.95	32.95	41.70	50.35
49	27.25	27.45	33.35	42.35	50.45
50	27.55	27.80	33.80	42.85	50.90

#### Limited Overland Routes (Continued)

		1		T	T
Maximum Weight (pounds)	Zone 1 (\$)	Zone 2 (\$)	Zone 3 (\$)	Zone 4 (\$)	Zone 5 (\$)
51	28.00	28.20	34.30	43.50	51.30
52	28.30	28.55	34.85	44.15	52.15
53	28.75	28.95	35.30	44.80	52.70
54	29.05	29.30	35.80	45.45	53.35
55	29.45	29.70	36.25	45.95	53.75
56	29.90	30.15	36.75	46.70	54.30
57	30.30	30.60	37.20	47.25	54.85
58	30.65	30.90	37.65	47.90	55.15
59	31.05	31.35	38.15	48.45	55.70
60	31.40	31.65	38.70	49.15	56.25
61	31.80	32.10	39.15	49.80	56.55
62	32.15	32.40	39.55	50.45	57.00
63	32.55	32.85	40.10	51.10	57.40
64	33.00	33.25	40.50	51.85	57.95
65	33.30	33.60	41.05	52.50	58.35
66	33.75	34.00	41.50	53.25	58.80
67	34.15	34.45	41.90	53.90	59.20
68	34.60	34.85	42.45	54.50	59.85
69	34.90	35.20	42.85	54.95	61.25
70	35.30	35.60	44.05	56.35	65.20
Oversized	52.25	52.70	71.95	79.30	96.30

#### Oversized Pieces

Regardless of weight, any piece that measures more than 108 inches (but not more than 130 inches) in length plus girth must pay the oversized price. As stated in the Domestic Mail Manual, any piece that is found to be over the 70 pound maximum weight limitation is nonmailable, will not be delivered, and may be subject to the \$100.00 overweight item charge.

#### Dimensional Weight

In Zones 1-89, parcels exceeding one cubic foot are priced at the actual weight or the dimensional weight, whichever is greater.

For box-shaped parcels, the dimensional weight (pounds) is calculated by multiplying the length (inches) times the width (inches) times the height (inches) of the parcel, and dividing by 166.

For irregular-shaped parcels (parcels not appearing box-shaped), the dimensional weight (pounds) is calculated by multiplying the length (inches) times the width (inches) times the height (inches) at the associated maximum cross-sections of the parcel, dividing by 166, and multiplying by an adjustment factor of 0.785.

These dimensional weight rules do not apply to the Limited Overland Routes price category.

#### Nonstandard Fees

Add the following fees to parcels that exceed certain dimensions, as specified below:

Entry:	Full Network	DSCF/DNDC	DDU	
Length > 22"	\$4.00	N/A	N/A	
Length > 30"	\$7.00	N/A	N/A	
Cube > 2 cu. ft.	\$15.00	N/A	N/A	

#### IMpb Noncompliance Fee

Add \$0.25 for each IMpb-noncompliant parcel paying commercial prices, unless the eVS Unmanifested Fee was already assessed on that parcel.

#### eVS Unmanifested Fee

Add \$0.25 for each unmanifested parcel paying commercial prices, unless the IMpb Noncompliance Fee was already assessed on that parcel.

#### Dimension Noncompliance Fee

Add \$1.50 for commercial parcels that exceed 1 cubic foot or with a length greater than 22 inches, if the customer did not provide dimensions or provided inaccurate dimensions in the electronic manifest file.

#### Pickup On Demand Service

Add \$26.50 for each Pickup On Demand stop.

# Competitive Rate Changes July 09, 2023 Implementation

Fiscal Year 2023		FY2023	FY2023	FY2023	FY2023	FY2023
October		Revenue	Volume	Attributable Cost	Contribution	Cost
		(000's)	(000's)	(000's)	(000's)	Coverage
Priority Mail Express						
Current Prices	\$	753, 139	25,502			
New Prices	\$	753,139	25,502			
Change	\$	-	-			
Total Olara Bashama Osmilar						
First Class Package Service		=	. === .==			
Current Prices	\$	7,619,626	1,773,455			
New Prices	\$	7,626,794	1,772,168			
Change	\$	7,168	(1,287)			
Retail Ground		004.440	10.070			
Current Prices	\$	301,140	12,378			
New Prices	\$	300,956	12,386			
Change	\$	(184)	8			
Priority Mail	•	44.000.004	4 171 5 10			
Current Prices	\$	11,928,824	1,171,549			
New Prices	\$	11,928,824	1,171,549			
Change	\$	-	-			I
Description of Observer Test 1						
Parcel Select Change - Total	•	0.660.007	2 400 700			
Current Prices	\$	9,663,237	3,423,763			
New Prices	\$	9,662,180	3,423,647			
Change	\$	(1,057)	(116)			I
Parcel Return Service - NSA						
Parcel Return Service - NSA Current Prices	ø	263,026	79,275			
	\$					
New Prices	\$	263,016	79,272			
Change	\$	(10)	(3)			
Premium Forwarding Service						
Current Prices	\$	24,190	920			
New Prices	\$	24,190	920			
Change	\$	-	-			
Post Office Box Services						
Current Prices	\$	1,177,778	-			
New Prices	\$	1,177,778	-			
Change	\$	-	-			
Address Enhancement Services	_					
Current Prices	\$	1,932	-			
New Prices	\$	1,932	-			
Change	\$	-	-			
Shipping & Mailing Supplies						
Current Prices	\$	113,119	-			
New Prices	\$	113,119	-			
Change	\$	-	-			
Other Ancillary Services						
Current Prices	\$	67,833	-			
New Prices	\$	67,833	-			
Change	\$	-	-			
Greeting Cards						
Current Prices	\$	23,848	-			
New Prices	\$	23,848	-			
Change	\$	-	-			
competitive International*						
Current Prices	\$	1,481,149	167,165			
New Prices	\$	1,481,149	167,165			
Change	\$	-	-			
Total Competitive Products (Current)	\$	33,418,842				
Total Competitive Products (New)	\$		6,652,609			
Differences	\$	5,917	(1,398)			
<del></del>						
Competitive Product	Contribution Calcu			•		
Total Contribution \$						
Institutional Cost \$						
Contribution from Competitive Products as a % o	r institutional Cost		34.7%			

## Competitive Rate Changes October 01, 2022 Implementation

Fiscal Year 2023		FY2023	FY2023	FY2023	FY2023	FY2023
October		Revenue	Volume	Attributable Cost	Contribution	Cost
		(000's)	(000's)	(000's)	(000's)	<u>Coverage</u>
Priority Mail Express						
Current Prices	\$	753,139	25,502			
New Prices	\$	753,139	25,502			
Change	\$	-	-			
First Class Package Service		=	. ==== .==			
Current Prices	\$	7,619,626	1,773,455			
New Prices	\$	7,652,036	1,767,680			
Change	\$	32,410	(5,776)			
Retail Ground Current Prices		004.440	10.070			
	\$	301,140	12,378			
New Prices	\$	300,339	12,419			
Change	\$	(802)	42			
Delanite, Mail						
Priority Mail Current Prices	\$	11,928,824	1,171,549			
Surrent Prices New Prices	\$ \$					
		11,928,824	1,171,549			
Change	\$	-	-			
Parael Salast Change Total						
Parcel Select Change - Total Current Prices	\$	0.662.227	2 402 762			
		9,663,237	3,423,763			
New Prices	\$	9,657,638	3,423,087			
Change	\$	(5,600)	(676)			
Parcel Return Service - NSA						
Current Prices	\$	263,026	79,275			
New Prices						
	\$	262,981	79,261			
Change	\$	(45)	(14)			
Premium Forwarding Service						
Current Prices	•	24,190	920			
	\$					
New Prices	\$	24,190	920			
Change	\$	-	-			
Post Office Box Services						
	œ.	4 477 770				
Current Prices	\$	1,177,778				
New Prices	\$	1,177,778	-			
Change	\$	-	-			
Address Enhancement Services						
Current Prices	\$	1,932	-			
New Prices	\$	1,932	-			
Change	\$	-	-			
Shipping & Mailing Supplies						
Current Prices	\$	113,119	-			
New Prices	\$	113,119	-			
Change	\$	-	-			
Other Ancillary Services		a				
Current Prices	\$	67,833	-			
New Prices	\$	67,833	-			
Change	\$	-	-			
Greeting Cards						
Current Prices	\$	23,848	-			
New Prices	\$	23,848	-			
Change	\$	-	-			
Competitive International*						
Current Prices	\$	1,481,149	167,165			
New Prices	\$	1,481,149	167,165			
Change	\$	-	-			
Total Competitive Products (Current)	\$	33,418,842				
Total Competitive Products (New)	\$		\$ 6,647,583			
Differences	\$	25,964	(6,423)			
					· <del></del>	
Competitive Product	Contribution Calcu					
Total Contribution \$						
			\$ 38,383,094			
Contribution from Competitive Products as a % o	t institutional Cost		34.8%			

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

In accordance with 39 C.F.R. § 3011.201, the Postal Service hereby applies for non-public treatment of the attributable cost, contribution, and cost coverage data in the unredacted version of the annex to Governors' Decision No. 23-1, as well as the supporting materials for those data, which include disaggregated product volume, weight, and revenue distribution information by price cell. The materials consist of spreadsheets that contain calculations to determine the weighted average price increase and cost coverage for the competitive products within the scope of this docket. The Postal Service hereby furnishes below the justification for this application as required by each subsection of 39 C.F.R. § 3011.201(b). For the reasons discussed, the Postal Service asks that the Commission grant its application for non-public treatment of the identified materials. The Postal Service is concurrently filing redacted versions of this file, where it has determined redactions to be practicable.

(1) The rationale for claiming that the materials are non-public, including the specific statutory provision(s) supporting the claim, and an explanation justifying application of the provision(s) to the materials.

The materials designated as non-public consist of information of a commercial nature as well as third-party business information that, under good business practice, would not be disclosed to the public. In the Postal Service's opinion, this information would be exempt from mandatory disclosure pursuant to 39 U.S.C. § 410(c)(2) and 5 U.S.C. § 552(b)(3) and (b)(4). Because the portions of the materials filed non-publicly

<sup>&</sup>lt;sup>1</sup> In appropriate circumstances, 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). The Commission has indicated that "likely commercial injury" should be construed broadly to encompass other types of injury,

in this docket by the Postal Service 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 the Postal Service's application for their non-public treatment.

(2) A statement of whether the submitter, any person other than the submitter, or both have a proprietary interest in the information contained within the non-public materials, and the identification(s) specified in paragraphs (b)(2)(i) through (iii) of this section (whichever is applicable). For purposes of this paragraph, identification means the name, phone number, and email address of an individual.<sup>2</sup>

None.

(3) A description of the information contained within the materials claimed to be non-public in a manner that, without revealing the information at issue, would allow the Commission to thoroughly evaluate the basis for the claim that the information contained within the materials are non-public.

The redacted information consists of the projected FY 2023 attributable cost, contribution, and cost coverage for the competitive product that is the subject of this docket. The Postal Service has filed information concerning the calculations used to develop the weighted average price increase by product and cost coverage. Protected information in the spreadsheets includes volume and revenue by price cell (weight

such as harms to privacy, deliberative process, or law enforcement 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.

<sup>&</sup>lt;sup>2</sup> Section 3011.201(b)(2) further states the following:

<sup>(</sup>i) If the submitter has a proprietary interest in the information contained within the materials, identification of an individual designated by the submitter to accept actual notice of a motion related to the non-public materials or notice of the pendency of a subpoena or order requiring production of the materials.

<sup>(</sup>ii) If any person other than the submitter has a proprietary interest in the information contained within the materials, identification of each person who is known to have a proprietary interest in the information. If such an identification is sensitive or impracticable, an explanation shall be provided along with the identification of an individual designated by the submitter to provide notice to each affected person.

<sup>(</sup>iii) If both the submitter and any person other than the submitter have a proprietary interest in the information contained within the non-public materials, identification in accordance with both paragraphs (b)(2)(i) and (ii) of this section shall be provided. The submitter may designate the same individual to fulfill the requirements of paragraphs (b)(2)(i) and (ii) of this section.

increment and zone), as well as product-specific cost data and other supporting data. Such information for competitive product categories is commercially sensitive at the disaggregated, cell-specific level shown in the spreadsheets.

# (4) Particular identification of the nature and extent of the harm alleged and the likelihood of each harm alleged to result from disclosure.

If competitors of the Postal Service were to have access to this information, they would likely focus their marketing and price cutting efforts on the Postal Service's most profitable products. This will lead to erosion of contribution of these products through lost sales and/or the need to lower prices to compete. Postal product cost and contribution information would provide suppliers of postal transportation and other services with information they could use to seek higher rates for services they provide. This would lead to higher postal costs and loss of contribution. Although the extent of the commercial harm is difficult to quantify, given that Shipping Services is a multi-billion dollar enterprise, even a small change in market share, prices, or costs could lead to millions of dollars in lost revenue, higher costs, and lower contribution margins. It is highly likely that if this information were made public, the Postal Service's competitors and suppliers would take advantage of it almost immediately.

Competitors could use the product-specific revenue, pieces, and weight information to analyze the Postal Service's possible market strengths and weaknesses and to focus sales and marketing efforts on those areas, to the detriment of the Postal Service. Disclosure of this information would also undermine the Postal Service's position in negotiating favorable terms with potential customers, who would be able to ascertain critical information about relevant product trends (e.g., average revenue per piece, average weight per piece).

# (5) At least one specific hypothetical, illustrative example of each alleged harm.

Identified harm: Competitors could use product cost, contribution, or cost coverage information to assess vulnerabilities and focus sales and marketing efforts to the Postal Service's detriment.

Hypothetical: Cost, contribution and/or cost coverage information is released to the public and available to a competitor. The competitor assesses the profitability of certain services based on the data released. The competitor then targets its advertising and sales efforts at actual or potential customers in market segments where the Postal Service has substantial contribution, thereby hindering the Postal Service's ability to maintain these customers.

Identified harm: Competitors could use disaggregated product volume, weight, and revenue distribution information to assess vulnerabilities and focus sales and marketing efforts to the Postal Service's detriment, and also during negotiations with the Postal Service.

Hypothetical: Disaggregated revenue, volume, and weights contained in the Nonpublic Annex are disclosed to the public. Another delivery service's employee monitors the filing of this information and passes it along to the firm's sales and marketing functions. The competitor assesses the profitability of certain services on a per-piece or per-pound basis or the Postal Service's relative concentration in certain service offerings. The competitor then targets its advertising and sales efforts at actual or potential customers in market segments where the Postal Service appears to have

made headway, hindering the Postal Service's ability to reach out effectively to these customers.

# (6) The extent of the protection from public disclosure alleged 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 market for domestic parcel shipping products as well as their consultants and attorneys. Additionally, suppliers of transportation or other services to the Postal Service that affect costs for competitive services should not have access to these materials; this restriction should include their consultants and attorneys. Also, the Postal Service believes that foreign postal operators, as well as actual or potential customers of a postal operator for this or similar products should not be provided access to the non-public Excel worksheets.

# (7) The length of time for which non-public treatment is alleged to be necessary 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 otherwise provided by the Commission. 39 C.F.R. § 3011.401(a). However, because the Postal Service's relationships with third parties that may have a proprietary interest in protected materials often continue beyond ten years or decades, the Postal Service intends to oppose requests for disclosure of these materials pursuant to 39 C.F.R. § 3011.401(b-c).

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

None.

### Conclusion

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