

**BEFORE THE
POSTAL REGULATORY COMMISSION**

**COMPETITIVE PRODUCT PRICES --
GLOBAL PLUS
NEGOTIATED SERVICE AGREEMENTS**

Docket No. CP2008-8

**COMMENTS OF UNITED PARCEL SERVICE
IN RESPONSE TO ORDER CONCERNING PRICES
UNDER GLOBAL PLUS
NEGOTIATED SERVICE AGREEMENTS
(June 19, 2008)**

Pursuant to Commission Order No. 81 (June 6, 2008), United Parcel Service comments on the United States Postal Service's notice of the Governors' decision establishing Global Plus contracts. The Commission has invited interested parties to comment on whether the Postal Service's planned Global Plus contracts are consistent with PAEA.

We are not able to comment on whether the proposed contracts are consistent with PAEA because all details surrounding the Governors' decision and the contracts themselves have been filed under seal. As we have said in our comments filed on June 16, 2008 in Docket No. CP2008-5 regarding Global Expedited Package Services contracts, we urge the Commission to require the public disclosure of this information, adopting protective measures for any part of the information that is truly commercially sensitive.

UPS commends the Commission for treating the initial Global Plus agreements as new products. Moreover, we suggest that the Commission resist any presumption that the markets for international package delivery and expedited services are perfectly competitive markets. Private carriers face more onerous customs and brokerage requirements in both the United States and abroad than postal administrations do, making these markets less competitive than is often assumed.

Respectfully submitted,

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