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July 13, 2017

Lizbeth Dobbins
Manager, Product Classification
U.S. Postal Service
475 L'Enfant Plaza SW
Room 4446
Washington, DC 20260-5015

Re: International Mailing Services: Mailing Services Rules Changes

Dear Ms. Dobbins:

The International Mailers' Advisory Group (IMAG), a trade association that represents primarily U.S. international mailers, submits the following comments to the Postal Service's Advanced Notice of Proposed Rulemaking in the May 31 [Federal Register](#). The proposal indicates USPS's intent to modify some of its International Mailing rules to conform with the new Universal Postal Union (UPU) requirements for certain Letter Post mail, effective January 1, 2018.

First, IMAG would like to express its appreciation for the efforts of the USPS' International Postal Affairs team and the Global Business group in keeping IMAG abreast of the changes stemming from the UPU's Integrated Product Plan (IPP) and for encouraging IMAG's feedback and input. We agree that communication and collaboration is essential for preparing the industry for IPP – both phase one and phase two of the program.

The UPU adopted definitions for documents and goods at its Istanbul Congress in fall 2016. As the advanced proposal notes, "in order for the Postal Service to meet this new standard, the contents of First Class Mail International (FCMI) postcard, letter, and large envelope (flat) mail; International Priority Airmail (IPA) postcard, letter, and large envelope (flat) mail; and International Surface Air Lift (ISAL) postcard, letter, and large envelope (flat) mail will be limited to documents." For IMAG members, this means – come January 2018 – that IPA, ISAL letters and flats, as well as First Class Mail International, cannot contain goods. It is important that the definition of a "good" be clear.

The *International Mailers Manual* Section 123.63 provides the existing determination of documents and goods, and postal officials have said this will be adapted to meet the new definitions and requirements for January 2018. And while people intuitively have a sense of what is in one category versus another, IMAG encourages the Postal Service to be specific in its forthcoming guidelines.

One area that needs refinement is around flash drives or other "electronic storage media," which is listed as merchandise in the current *IMM*. IMAG members note that a distinction should be made between electronic storage media that is being used to transmit correspondence, communication or business records that could also be in printed form, versus blank storage devices bought as a product for future use, as well as storage devices containing gaming or music that have value.

IMAG also requests that USPS continue to allow goods of nominal value sent in conjunction with communications of informational material be sent without a customs form or electronic data. Under the *IMM*, "Known Mailers" are allowed to send mailpieces containing "goods of nominal value" (less than \$1.00) in conjunction with communications of informational materials for which no custom form is required in the destination country.

Known mailers sending goods of nominal value should be treated as they are today without the need for a customs form. It seems incongruous that these mailings would be treated as a "good" and require a customs form and electronic transition of data, which are costly adjustments for mailers to make, specifically the software and shipping platforms required to upload the required information to the USPS. Many nonprofit organizations include these inexpensive items as sweeteners to their direct mail offers.

If it is helpful, perhaps the language in the *IMM* could be revised to say "items of nominal value" so the word "goods" is not included and thus eliminates any confusion about whether these items can be mailed without a customs form.

Thank you for the opportunity to communicate our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Kate Muth", with a long, sweeping horizontal line extending to the right.

Kate Muth
Executive Director