



UPS  
55 Glenlake Parkway NE  
Atlanta, GA 30328

March 15, 2022

*VIA EDGAR*

U.S. Securities and Exchange Commission  
Division of Corporation Finance  
Office of Energy & Transportation  
100 F Street, N.E.  
Washington, D.C. 20549  
Attn: Sondra Snyder and Gus Rodriguez

**Re: United Parcel Service, Inc.  
Form 10-K for the Fiscal Year Ended December 31, 2021  
Filed February 22, 2022  
File No. 001-15451**

Dear Ms. Snyder and Mr. Rodriguez:

This letter contains our response to the comment received from the staff of the U.S. Securities and Exchange Commission by letter dated March 10, 2022 (the "Letter") regarding the filing listed above by United Parcel Service, Inc. (references to the "Company" or "UPS" include any or all of United Parcel Service, Inc. and its subsidiaries).

For ease of reference, we have repeated the caption and comment contained in the Letter below, in italics, together with the subheadings used in the Letter.

*Form 10-K for the Fiscal Year Ended December 31, 2021*

*Item 1A. Risk Factors*

*Changes in general economic conditions, in the U.S. and internationally, may adversely affect us, page 9*

- 1. You refer to the adverse impact on your business due to geopolitical uncertainties and conflicts in the Russian Federation and Ukraine. Please describe the adverse impact of Russia's invasion of the Ukraine on your business, including the impact on your operations and potential asset impairments.*
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Response to Comment 1:

The Company does not have any material business, operations or assets in Russia, Belarus or Ukraine, and has not been materially impacted by the actions of the Russian government. The Company's total revenue from these three countries constitutes less than 1.0% of consolidated revenue.

As has been disclosed by the Company on its corporate website, *www.ups.com*, as a result of Russia's invasion of Ukraine, the Company has temporarily suspended all shipping services to, from and within Ukraine, Belarus and Russia, until further notice. In addition, the Company has halted overflights of Russia, with no material impact on the Company's costs.

If and when the actions of the Russian government are reasonably likely to materially impact the Company or its operations, the Company undertakes to include appropriate disclosures in its public filings.

If you have any questions regarding the responses set forth above, please do not hesitate to contact the undersigned at (404) 828 4407 or at [bnewman1@ups.com](mailto:bnewman1@ups.com).

Sincerely,

/s/ Brian Newman

Brian O. Newman  
Executive Vice President and Chief Financial Officer

cc: UPS Audit Committee