

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268

DSCF STANDARD MAIL LOAD LEVELING

Docket No. N2014-1

**REVISED RESPONSES OF  
UNITED STATES POSTAL SERVICE WITNESS MALONE  
TO PUBLIC REPRESENTATIVE INTERROGATORIES  
(PR/USPS-T1-3(a)&(c) and T1-4(a) [ERRATA]**

The United States Postal Service today files the revised responses of witness Linda Malone to the above-identified interrogatories of the Public Representative, dated January 3, 2014. The original responses were filed on January 10, 2014, and indicated that answers were forthcoming to interrogatories PR/USPS-T1-3(c) and T1-4(a). Those answers are now included in the revised responses. In addition, the answer to T1-3(a) has been supplemented to summarize the content of USPS Library Reference N2014-1/6, which also is being filed today. There are no changes in the original answers to either T1-3(b) or T1-4(b). The revised responses to T1-3 and T1-4 filed today supersede the responses filed on January 10, 2014.

Respectfully submitted,

UNITED STATES POSTAL SERVICE  
By its attorneys:

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January 17, 2014

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MALONE  
TO PUBLIC REPRESENTATIVE INTERROGATORY**

**Revised: January 16, 2014**

**PR/USPS-T1-3**

On pages 8-11 of your testimony, you describe MTAC Workgroup 157, a committee of mailing industry representatives and postal managers which discussed strategies for workload leveling prior to the South Jersey Operations Test.

- a. Please identify, describe, and provide all documents pertaining to MTAC Workgroup 157 meetings, including but not limited to meeting minutes, meeting notices, and MTAC presentations.
- b. Please identify any members of MTAC Workgroup 157 that mail fewer than 100,000 DSCF Standard Mail pieces/year.
- c. Please identify and provide any feedback from any MTAC member that supported an earlier CET for Friday and Saturday instead of altered service standard for DSCF Standard Mail accepted on Fridays and Saturdays.

**RESPONSE**

- (a) The MTAC Workgroup 157 documents will be contained in USPS Library Reference N2014-1/6. It is assumed that the interrogatory seeks documents pertaining to the substantive topics raised during or in connection with Workgroup 157 (and related) meetings, as opposed to such administrative matters as the scheduling of meetings. Accordingly, only the former records have been provided.
- (b) MTAC Workgroup 157 is comprised of volunteer MTAC representatives employed by the mailing industry firms or associations identified in the materials provided in response to subpart (a). No effort was made to restrict Workgroup participation based on mail volume generated by any participating mailer or clients of mail service providers. MTAC Workgroup members often represent the interests of an industry group or association to which their firm belongs, and the interests of that group or association can be diverse, in terms of mail volume. Some of the Workgroup 157 members work for firms that provide

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mail production, printing, presorting, and entry services to bulk mailers of different sizes. The Postal Service does not have data that reflect the mail volume generated by each of these firms' clients.

- (c) In going through my records, I could find none that memorialized the views expressed by Workgroup members regarding the concept of variable CETs. My general recollection is that there was opposition to the concept of having to alter general production schedules to meet postal CETs that varied depending on the day of the week. That this would entail software changes that the mailers would have to incorporate so that production runs could be day specific. I recall several mailers indicating that if we changed the CET to just one minute after midnight, this would have the same effect as taking Sunday out of a day of measurement.

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**Revised: January 16, 2014**

**PR/USPS-T1-4**

On page 15 of your testimony, you state that some mailers with a strong preference for Monday delivery and would enter mail on Thursday to preserve Monday delivery, but believe “based on earlier discussions with mailers” that many mailers will not change their mail entry patterns.

- a. Please identify, describe, and provide all documents detailing these discussions with mailers.
- b. Please identify, describe, and provide all documents related to any nationwide or substantially nationwide study or survey undertaken by the Postal Service to assess the volume of DSCF Standard Mail that would be entered on a different day under the adjusted service standard. If no such study or survey was undertaken, please describe the reason(s) why not.

**RESPONSE**

- (a) The Postal Service has no minutes or written summaries of the meeting discussions that I referenced in my testimony. My testimony relies on my general recollection of discussions that occurred. The only record I have located that would appear to reflect the view that many mailers will not change their entry patterns in response to the proposed service change is the attached copy of an email I received from a representative of a firm that generates DSCF Standard Mail letters. It was addressed to me and my Workgroup 157 Industry Co-Chair. See paragraph 5b in the attachment. I have taken the liberty of redacting information that would identify the firm of the sender and the other parties’ email addresses, phone and fax numbers. Otherwise, the content of the email is verbatim as I received it.
- (b) No such study or survey has been undertaken. The Postal Service assumes that feedback received through the Workgroup and as part of the rulemaking will provide useful insight.

Attachment to Response to PR/USPS-T1-4(a)  
Page 1

**From:** XXXXXXXXXXXXXXXXXXXXXXXX  
**Sent:** Tuesday, November 26, 2013 11:32 AM  
**To:** XXXXXXXXXXXXXXXXXXXX; Malone, Linda M - Washington, DC  
**Subject:** WG #147 Load Leveling

Linda/Dale, you requested recommendations for WG#147 at last Thursday's meeting.

Here are some thoughts in regard to the consideration being given to change Standard Mail service standards from up to 3 days, to, up to 4 days for DSCF entries:

1. Since the load leveling change should affect only flats and not letters, **a proposed service standard change should apply only to flats.**
2. Since the load leveling change is intended to impact only Friday and Saturday inductions, **any service standard change should apply only to those days.**
3. I think it's important to make these impact distinctions clear if you want buy-in across the industry and with the PRC. The last thing that's desired are headlines stating that the struggling Postal Service is reducing service levels to save money. **It is important to state the limited scope.**
4. **Otherwise, if the service standards are instead made across the board (not specific to entry day or shape), I believe this will reflect very poorly on the Postal Service, eroding the value of mail, and push more mail out of the system.**
5. Further,
  - a. Despite the intended result, adding a day to the service standard will no doubt result in greater variability and **erode the predictability that the Service has achieved and the industry has come to rely on in the past two years.** It is also counter to the CIO drive toward adding predictability to the mail.

- b. By adding a postal service day for Thursday entries after 1600 through Saturday, weekly mailer production schedules are squeezed by a day for those who desire the same delivery target experienced today. – This will also reduce the effectiveness of the load leveling.
- c. When combined with the Postal Service plan to **eliminate Saturday delivery, this squeezes weekly mailers at both ends, leading to even greater mailing overlap and sales cannibalization.**

Thank you for taking these thoughts into consideration.

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Assistant Vice President Fulfillment / Postal Affairs

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