

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

ANNUAL COMPLIANCE REVIEW

2019 Docket No. ACR2019

MOTION FOR ISSUANCE OF INFORMATION REQUEST NO. 2
STEVE HUTKINS

February 7, 2020

Pursuant to 39 C.F.R. § 3001.21(a), I respectfully request that the Presiding Officer issue an Information Request to obtain responses to the questions stated at the end of this motion. They concern (1) the emergency suspension data that the Postal Service provided on January 31, 2020 in response to Chairman's Information Request No. 6 and (2) the density test data on collection boxes.¹

RATIONALE

The overall rationale for these information requests is the same as discussed in my previous motion for issuance of an information request as part of ACR2019, so I will not repeat that discussion here.² Following are comments about the need for the specific requests proposed in this motion.

¹ Docket No. ACR2019, Chairman's Information Request No. 6 and Notice of Filing Under Seal, January 24, 2020; Responses of the United States Postal Service to Questions 1-9 of Chairman's Information Request No. 6, January 31

<https://www.prc.gov/docs/111/111979/CHIR%20No.%206.pdf>

<https://www.prc.gov/dockets/document/112123>

² Steve Hutkins, Motion for Issuance of Information Request, January 15, 2020, at 2-10

https://www.prc.gov/docs/111/111868/Hutkins_Information_Request.pdf

1. Inaccuracies in the suspension data

In response to Chairman's Information Request No. 6, Question No. 1, the Postal Service provided a spreadsheet that contains information about post offices suspended at the end of FY2019.³ This file (referred to below as the "2019 list") appears to be defective in several respects.

For most of the 400 offices on the list, the zip codes are wrong, and many of the dates for when the suspension occurred and when the discontinuance proposal was posted are inconsistent with the dates that appear in the previous suspension update filed in January 2017 as part of 2016ACR (referred to below as the "2016 list").⁴ For many offices, the 2019 list shows NULL, which, the Postal Service explains, means that the information is currently unavailable; yet in some cases, this information appears on the 2016 list. The 2019 list does not provide any dates for community meetings, even when the 2016 list had provided dates. It is not clear why information that had been available in January 2017 is not available in January 2020.

a. Zip codes: The zip codes for nearly all of the offices on the 2019 list are incorrect. Here is a sample showing the 9-digit zip as presented in the 2019 list and the 5-digit zip shown on the "Look Up a Zip Code" page on USPS.com.⁵

³ Excel file "PostOfficesFY2019.ChIR.6.Q.1.xlsx," Jan. 31, 2020
<https://www.prc.gov/dockets/document/112123>

⁴ Library Reference USPS-FY16-45, Excel file "Suspended_EOY16.xls," Jan. 23, 2017
<https://www.prc.gov/dockets/document/98763>

⁵ <https://tools.usps.com/zip-code-lookup.htm?bycitystate>

OFFICE	STATE	ZIP ON 2019 LIST	ACTUAL ZIP
ADELPHI	OH	383319998	43101
ALMO	KY	188139800	42019
ALPHA	NJ	136779998	08865
AMITY	MO	599109998	64422
ANGORA	MN	883239800	55703
ARDEN	NY	109799800	10910
ARGYLE	MI	628169998	48410
ASSINIPPI	MA	79501810	02339
ATHENS	IN	633429998	46912
AUSTIN	KY	170179800	42123

It should be noted that while the offices and zip codes are incorrectly matched on the 2019 list, the zip codes do correspond to other offices on the list, so most likely the rows of the table were simply misaligned.

b. Suspension dates: For numerous offices, the suspension dates shown in the 2019 list differ from the dates shown the 2016 list. For example:

OFFICE	STATE	SUSPENSION DATE ON 2016 LIST	SUSPENSION DATE ON 2019 LIST
ADELPHI	OH	10/2/15	12/20/18
ALMO	KY	7/22/15	5/31/15
ALPHA	NJ	5/1/08	10/1/15
AMITY	MO	2/5/15	1/10/18
ANGORA	MN	11/21/12	8/30/19
ARDEN	NY	7/18/09	7/1/01
ARGYLE	MI	3/31/15	9/10/18
ASSINIPPI	MA	8/16/12	1/31/12
ATHENS	IN	12/28/13	10/17/16
AUSTIN	KY	8/9/13	10/31/15

It appears that nearly all of the suspension dates for the 228 offices that appear on both the 2016 list and 2019 list have such inconsistencies. (The only offices for which the dates are consistent are those with the correct zip codes; there are about 20 of them.)

c. Proposal dates: Numerous offices show a “Proposal Posting Date” in the 2019 list that differs from the “Proposal Date” shown in the 2016 list. For example:

OFFICE	STATE	ZIP	PROPOSAL DATE ON 2016 LIST	PROPOSAL POSTING DATE ON 2019 LIST
SWIFTOWN	MS	38959	4/14/11	2/7/14
FREEPORT	KS	67049	7/14/11	9/22/11
TOPAZ	CA	96133	8/26/11	9/13/11
ROCKBRIDGE	MO	65741	8/27/11	9/22/11
CATHARINE	KS	67627	8/29/11	7/19/11
PYRITES	NY	13677	9/22/11	12/23/11
HIAWATHA	WV	24729	10/7/11	9/6/11
GIVEN	WV	25245	10/13/11	9/2/11
SAVERTON	MO	63467	10/20/11	9/28/11
SOUTHBORO	FL	33405	10/28/11	9/27/11
WYARNO	WY	82845	10/28/11	7/26/11
LIVONIA CENTER	NY	14488	11/3/11	10/14/11

There are about 30 offices where the dates for the proposal are inconsistent. Perhaps this is due to the same problem that caused the zip code errors. Or perhaps the “proposal date” and “proposal posting date” do not refer to the same step in the discontinuance process.

d. NULL values: The 2019 list shows NULL values in many cells for which the 2016 list provided dates. For example:

OFFICE	STATE	ZIP	PROPOSAL DATE ON 2016 LIST	PROPOSAL POSTING DATE ON 2019 LIST
CENTURY CITY FINANCE	CA	90035	10/11/13	NULL
WINCHENDON SPRINGS	MA	01477	11/1/13	NULL
MERIDEN STATION	CT	06450	11/25/13	NULL
CHATAWA	MS	39632	1/8/14	NULL
GREENWOOD	TX	76246	1/14/14	NULL
ROSSTON	TX	76263	1/23/14	NULL
MYRA	TX	76253	1/24/14	NULL
LOWAKE	TX	76855	2/5/14	NULL
PANTHER BURN	MS	38765	2/18/14	NULL

The Postal Service says “NULL” means that “the information is currently unavailable.”⁶ It is not clear why this information is not available now when it was available when the 2016 list was submitted in January 2017.

e. Dates for community meetings: The 2019 list provides no dates for community meetings because, the Postal Service explains, “the CSDC (Change Suspension Discontinuance Center) system does not contain information for date of community meeting.”⁷ But the 2016 list did provide dates in many of these cases. For example:

⁶ Responses of the United States Postal Service to Questions 1-9 of Chairman’s Information Request No. 6, January 31, question 1

<https://www.prc.gov/docs/112/112123/ChIR%20No.%206.Public.Responses.pdf>

⁷ Responses of the United States Postal Service to Questions 1-9 of Chairman’s Information Request No. 6, January 31, question 1

OFFICE	STATE	ZIP	COMMUNITY MEETING DATE ON 2016 LIST	COMMUNITY MEETING DATE ON 2019 LIST
ADELPHI	OH	43101	9/22/15	
WILKINSBURG	PA	15221	1/1/00	
MERIDEN STATION	CT	06450	1/1/00	
BROWN STATION	RI	02912	1/1/00	
FIFTY LAKES	MN	56448	1/1/00	
COURTENAY	ND	58426	2/13/09	
MCLEOD	ND	58057	4/9/09	
DUBRE	KY	42731	12/3/10	
PRIMROSE	KY	41362	1/31/11	
THAYER	IA	50254	2/9/11	
CHAPMAN RANCH	TX	78347	3/16/11	

It is not clear why this information about the dates for community meetings that have taken place is no longer available or why the CSDC system will no longer track any community meeting dates.

2. The density test data

In my previous motion on ACR2019, I asked the Chairman to request an Excel spreadsheet containing data on the Collection Point Management System, as the Postal Service had provided in Docket No. ACR2015. The Chairman made the following request: "In Docket No. ACR2015, the Postal Service filed an Excel spreadsheet

containing data on the Collection Point Management System. Please file an updated library reference with FY 2019 data.”⁸

The library reference submitted by the Postal Service as part of ACR2015 also contained a second set of data with volume numbers entitled “ChIR.6.Q2b.Density Test.xlsx.” The Chairman did not request an updated version of this second Excel spreadsheet for the ACR2019, and the Postal Service has not provided it. But it is important that this information is shared with the Commission staff and the public.

As I stated in my previous motion for ACR2019, “The volume data provide an opportunity for the public and the commission to evaluate whether the Postal Service is complying with its policy not to remove collection boxes that receive a daily average of at least 25 pieces of mail.”⁹

In addition, with access to both collection times and volume data, the Commission and the public will be able to evaluate the adequacy of collection times at collection boxes that receive a high volume of mail. Moreover, production of both collection times and volume data is important for enabling trend analyses. Annual volume data from collection boxes will allow for evaluation of changes in the ways in which the general public accesses the postal system over time.

The volume data also will inform an understanding of the relative importance of the collection box network as an access point for First-Class Mail. For example, a

⁸ Docket No. ACR2019, Chairman’s Information Request No. 6 and Notice of Filing Under Seal, January 24, 2020; the previous file referenced is Docket No. ACR2015, Library Reference USPS-FY15-45, February 3, 2016, folder “ChIR.6.Q.2.CPMS,” Excel file “ChIR.6.Q2a.CPMS.xlsx.”

<https://www.prc.gov/docs/111/111979/CHIR%20No.%206.pdf>

⁹ Hutkins, Motion for Issuance of Information Request, January 15, 2020, at 9

https://www.prc.gov/docs/111/111868/Hutkins_Information_Request.pdf

decline in overall First-Class Mail volume may or may not signal a change in the importance of a robust collection box network. Collection boxes conceivably could become a relatively more important source of First-Class Mail as overall volume in the class declines. However, without volume data, we will not know. Volume data will provide concrete insights into customers' need for and use of collection boxes.

PROPOSED INFORMATION REQUESTS

1. Please confirm that PostOfficesFY2019.ChIR.6.Q.1.xlsx contains numerous zip code errors. If confirmed, please submit a corrected list.
2. Please confirm that PostOfficesFY2019.ChIR.6.Q.1.xlsx contains dates inconsistent with the earlier suspension list filed in ACR2016. If confirmed, please submit a corrected list or explain why the dates are different.
3. PostOfficesFY2019.ChIR.6.Q.1.xlsx contains numerous cells with Null values and an entire column (for community meeting dates) with no values. In many of these cases, the earlier version of this list filed in ACR2016 had provided dates. Please explain why the updated list does not include the dates provided in the earlier list, and please explain why the CSDC system will no longer track community meeting dates.
3. Please submit an update of ChIR.6.Q2b.Density Test.xlsx that was filed in Docket No. ACR2015 Library Reference USPS-FY15-45, February 3, 2016.

Respectfully submitted,
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