Postal Regulatory Commission
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BEFORE THE POSTAL REGULATORY COMMISSION
WASHINGTON, D.C.

RANDALL EHRLICH, Complainant.	Docket No.: C2020-1 **THIRD DECLARATION OF RANDALL EHRLICH**

I, **RANDALL EHRLICH,** being over 18, of sound mind, and having personal knowledge, declare under penalty of perjury under the laws of the United States that the following is true and correct:

1. I submit this declaration in support of my motion to expand issues of consideration by the PRC

2. The *Seattle District Animal/Insect Policy* (Exh. 1 to USPS Response to ChIR No. 1) states, "Carriers will not enter into yards or areas where a dog (or dogs) are not being kept beyond a solid closed door of wooden or steel construction (not a screen or storm door), behind an adequate fence, or tied by a sturdy leash, tether or chain at least 20 feet from the mail receptacle."

3. This aspect of the Policy discriminates against customers who own dogs but lack air conditioning by prohibiting them from opening the front door, while securing the entrance with a screen or storm door, to allow for cross-ventilation of the dwelling. Even for those who are present and supervising their dogs, like me, or those who also use a gate as a secondary

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barrier to the storm or screen door, again like me, this Policy professes to bar any mail delivery to such residences. It does so without due regard for the dog's age, sex, size, breed composition, sterilization status, degree of training, assistance animal status (e.g., emotional support, service, therapy), animal control complaint history, adverse designation status (e.g., vicious, potentially dangerous, dangerous), ambulatory capability, weight, and other factors.

4. It is common in Seattle for residences, including my own, not to have air conditioning but to instead rely on air flow through a screen door. It is also highly common for Seattlites to own dogs, even more dogs than children. *See* Gene Balk, *In Seattle, it's cats, dogs and kids – in that order,* The Seattle Times (2.1.13); Diana Wurin, *Seattle's Dog Obsession: With more canines than children living within city limits, Seattle has officially gone to the dogs,* Seattle Magazine (October 2011).

5. Because I believe this Policy is ripe for abuse and is unreasonably and unduly discriminatory against me and other dog owners without air conditioning, I ask the PRC to expand the issues of this case to examine the Policy through the lens of 39 USC 403(C) and set a national standard for all letter carriers that is based on the proven behavior of a specific dog impeding mail delivery, not stereotypes and erroneous presumptions.

6. I also respectfully ask the PRC to expand the issues to examine the unreasonably and unduly discriminatory behavior of the letter carrier assigned to my route, Voisine, under 39 USC 403(C), for even if mail is restored to my porch, so long as she retains control over my mailpieces, I remain legitimately vexed and concerned that she will continue to tamper with, deface, and destroy my mail, as well as engage in continued retaliatory, harassing, and to this day unaddressed and condoned misbehavior.

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7. Restoring mail to my porch by Voisine will prove a Pyhrric victory, forcing me back before the PRC to rectify the discrimination instigated by a notorious USPS employee.

8. Both of these issues fall within the scope of the *Prayer* to the *Complaint,* Para. B ("That all discriminatory acts and omissions against Ehrlich cease immediately.").

Executed this May 11, 2020 in the city of Seattle, Wash.

Randall Ehrlich

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