

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

ANNUAL COMPLIANCE REVIEW 2020

Docket No. ACR2020

MOTION FOR ISSUANCE OF INFORMATION REQUEST
STEVE HUTKINS
(January 19, 2021)

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 in this motion. I believe the responses would be beneficial to the Commission's important annual evaluation of the Postal Service's compliance with the provisions of 39 U.S.C. § 3652, and with the related regulations regarding Customer Access to Postal Services as set forth in 39 C.F.R. § 3055.91. The information elicited will assist the Commission and its staff in conducting core regulatory analysis and improve staff efficiency in conducting the analysis.

The information requested here focuses on the following topics, all of which have been addressed and noted as important by the Commission in previous Annual Compliance Determination (ACD) reviews: Emergency suspensions, contract postal facilities, post office hours of operation, collection points, collection boxes, and service performance.

RATIONALE FOR PROPOSED REQUESTS

Most of the material that would be elicited by the proposed information requests has been provided by the Postal Service in previous years and thus should not present

a significant burden. None of the requests proposed would generate responses containing information of a sensitive commercial nature that would be harmful to the Postal Service or its operations if they were made public. Rather, the Commission's past information requests suggest that such information is routine and valuable regulatory data that imposes no material burden and causes no harm. By obtaining this information, it is included in the ACD docket record, and it is available to the Commission and its staff as they do their analysis for the ACD.

EMERGENCY SUSPENSIONS

Since the FY 2015 ACD, the Commission has repeatedly expressed concerns about the large backlog of unresolved emergency suspensions.¹ As part of the 2019 Annual Compliance Report, the Postal Service provided an Excel spreadsheet with some data about the suspensions.² I submitted a motion requesting more information about these facilities.³ Chairman Taub subsequently requested more information about the suspensions, which the Postal Service provided.⁴ As part of the 2020 ACR, the Postal Service submitted Library Reference USPS FY20-33, which provides the same

¹ See FY 2018 Annual Compliance Determination Report, April 12, 2019, at 198, available at https://www.prc.gov/docs/108/108781/2018_ACD.pdf

² Docket No. ACR2019, Library Reference USPS-FY19-33, December 27, 2019, Excel file "PostOfficesFY2019.xlsx," tab "Suspended End of FY19, available at <https://www.prc.gov/dockets/document/111583>

³ Docket No. ACR2019, Steve Hutkins Motion for Issuance of Information Request, January 15, 2020, available at https://www.prc.gov/docs/111/111868/Hutkins_Information_Request.pdf

⁴ Docket No. ACR2019, Chairman's Information Request No. 6, no. 1, January 24, 2020, available at <https://www.prc.gov/docs/111/111979/CHIR%20No.%206.pdf>; Responses of the United States Postal Service to Chairman's Information Request No. 6, no. 1, "PostOfficesFY2019.ChIR.6.Q.1.xlsx," January 31, 2020, available at <https://www.prc.gov/dockets/document/112123>

kind of information it had provided for the 2019 ACR.⁵ I would ask the Chairman or Commission to request the more detailed list that was requested last year.

CONTRACT FACILITIES

Contract Postal Units (CPUs), Community Post Offices (CPOs), and Village Post Offices (VPOs) represent a highly significant portion of the Postal Service's retail network, in terms of the total number of facilities, the geographic area they serve, and the number of customers who use them. Chairman Taub has already filed an information request asking data about the total number of CPUs, CPOs, and VPOs in existence at the beginning and end of FY 2020 as well as the number that opened and closed during the year.⁶ This summary is useful, but complete national lists of CPUs, CPOs and VPOs would be more helpful for Commission analysis. Such lists presumably already maintained by the Postal Service. Last year, I requested these lists in a motion.⁷ The Chairman subsequently issued Information Request No. 6, no. 3 (about CPOs) and no. 4 (about CPUs).⁸ Because CPUs, CPOs and VPOs provide postal services to a large segment of the Nation, it would be helpful for the ACD if the Postal Service provided the CPO and CPU information again, as well as the list of VPOs.

⁵ Docket No. ACR 2020, Library Reference USPS–FY20–33, Excel file “PostOfficesFY2020.xls,” tab “Suspended End of FY20,” Dec. 29, 2020, available at <https://www.prc.gov/dockets/document/115699>

⁶ Docket No. ACR 2020, Chairman's Information Request No. 1, nos. 5,6,7, January 11, 2020, available at <https://www.prc.gov/docs/115/115803/CHIR%20No.%201.pdf>

⁷ PRC Docket No. ACR2019, Steve Hutkins Motion for Issuance of Information Request, Jan. 15, 2020, available at https://www.prc.gov/docs/111/111868/Hutkins_Information_Request.pdf

⁸ Information Request No. 6 and Notice of Filing Under Seal, January 24, 2020, available at <https://www.prc.gov/docs/115/115803/CHIR%20No.%201.pdf>

COLLECTION POINTS

Last year, I asked the Commission to request a copy of the Collection Point Management System (CPMS) database, as it had done in the ACD dockets for 2015, 2016, and 2017.⁹ Chairman Taub requested an Excel spreadsheet containing data from the CPMS as the Postal Service had provided in Docket No. ACR2015.¹⁰ In response, the Postal Service provided an Excel spreadsheet with the Box Schedule data, but it did not provide, as it had in 2015, the Excel sheet with the Density Test data.¹¹

It is important for the Commission and the public to have an opportunity to review both the collection times and density data. With this information, one is able to evaluate several factors: the adequacy of collection times at collection boxes that receive a high volume of mail, 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, what current service levels (box locations and collection times) are, and how those levels have changed, and possibly eroded, over time. Annual volume sample data from collection boxes, which already exists, will also allow for evaluation of changes in the ways in

⁹ Docket No. ACR2019, Steve Hutkins, Motion for Issuance of Information Request, no. 4, January 15, 2020, available at https://www.prc.gov/docs/111/111868/Hutkins_Information_Request.pdf; and Steve Hutkins, Motion for Issuance of Information Request No. 2, no. 3, February 7, 2020, available at https://www.prc.gov/docs/112/112318/Hutkins_Information_Request_No.2.pdf

¹⁰ Docket No. ACR2019, Chairman's Information Request No. 6, no. 5, January 24, 2020, available at <https://www.prc.gov/docs/111/111979/CHIR%20No.%206.pdf>

¹¹ See Docket No. ACR2015, USPS-FY15-45, Public Material Provided in Response to Chairman's Information Request No. 6, Feb. 3, 2016, available at <https://www.prc.gov/dockets/document/94901>, and Docket No. ACR2019, Library Reference USPS-FY19-47, Public Material Provided in Response to ChIR No. 6, Excel file "CPMSFY2019.ChIR.6.Q.5.xlsx," Jan. 31, 2020, available at <https://www.prc.gov/dockets/document/112127>

which the general public accesses the postal system over time, as well as informing an understanding of the relative importance of the collection box network as an access point for First-Class Mail. The volume data is even more important in the context of the concern caused by collection box removals during the summer of 2020 and the plan to remove many thousands more during FY 2021 (discussed in the next section).

COLLECTION BOX REMOVALS

In its ACR, the Postal Service reports, “Nationally, there were 140,845 collection boxes available at the end of FY 2020, compared to 142,300 at the beginning of the fiscal year.” Library Reference USPS FY20-33 provides more details about the number of boxes, but that is all the Postal Service has provided thus far in the ACD. Given the importance of collection boxes for facilitating intake of both residential and business mail into the system, the issue deserves much more attention. This is even more important during a national pandemic, which may hinder the ability to bring mail to a post office, or to leave it unattended outside of a home or small business. Small businesses and households that depend on local collection boxes find them essential.

Last summer, the widespread and unexpected removal of collection boxes became an issue of national concern. Appearing before Congress, the Postmaster General downplayed the removals and suggested it was all business as usual. As he told the House Oversight Committee, “So this is a long-standing thing that’s been going on in the Postal Service for a long time.”¹² The Postmaster General did not

¹² Postmaster General Louis DeJoy Testimony Transcript, August 24, 2020: House Oversight Hearing, available at <https://www.rev.com/blog/transcripts/postmaster-general-louis-dejoy-testimony-transcript-august-24-house-oversight-hearing>

share, however, that the Postal Service had initiated a Work Hour Reduction plan that included removing thousands of collection boxes.¹³ On June 26, 2020, a presentation was given at postal headquarters about this plan, which was designed to cut 64 million hours. The plan included a “Collection Box Optimization” strategy to eliminate 29,618 boxes in FY 2021. It is possible that the removals that took place during the summer of 2020 were intended to get a jump on this ambitious goal of removing 30,000 boxes. Here is the slide from this presentation.¹⁴



LDC	Work Hour Reduction Target – Additional Strategies						
	Strategies	Description	Q1	Q2	Q3	Q4	Fiscal Year 21
21 - Carrier Office Hours	Expedited to the Street Afternoon Sortation	Eliminate 60% of same day overtime	Test	TBD	TBD	TBD	TBD
	Caseless	Square footage savings from redundant casing equipment	Test	TBD	TBD	TBD	TBD
22 - Carrier Street Hours	Route Inspection	Right sizing route structure	200 Routes	\$5 M	1,800 Routes \$5 M	\$50 M	2,000 Routes \$60 M
	Mode of Delivery	Major Metro Street Efficiency	Test	TBD	TBD	TBD	TBD
27 – Carrier Collections	Collection Box Optimization	Eliminating low volume and multiple pickup boxes (7.5 minutes per box/day)	7,404 Boxes	7,404 Boxes \$3 M	7,405 Boxes \$6 M	7,405 Boxes \$9 M	29,618 Boxes \$18 M
Total							

¹³ The Work Hour Reduction plan was the subject of presentations at meetings of USPS leadership, on June 26, 2020, July 7, 2020, and July 10, 2020; these presentations were made public as exhibits in *New York v Trump*, 1:2020cv02340, and they are available at <https://docs.google.com/viewerng/viewer?url=https://www.savethepostoffice.com/wp-content/uploads/2020/10/USPS-presentations-6-26-20-7-7-20-7-10-20.pdf&hl=en>. The Work Hour Reduction plan is examined in a report by the Office of Inspector General, “Operational Changes to Mail Delivery,” Report Number 20-292-R21, October 19, 2020, available at <https://www.uspsoig.gov/sites/default/files/document-library-files/2020/20-292-R21.pdf>

¹⁴ *New York v Trump*, Case No. 1:20-cv-02340, Exhibit 39, October 19, 2020, available at <https://www.savethepostoffice.com/wp-content/uploads/2020/10/USPS-presentations-6-26-20-7-7-20-7-10-20.pdf>

According to a report by the USPS Office of Inspector General about the Work Hour Reduction plan, “From FY 2015 through August 31, 2020, the Postal Service removed 15,779 collection boxes.”¹⁵ The 30,000 collection box removals included in the plan are thus about twice as many removals as have taken place since the beginning of FY 2015. These removals represent over 21 percent of the total number of boxes (140,000). The removals would clearly have a significant, serious and nationwide impact on customer access to postal services. Removing collection boxes obviously makes it more difficult for customers, particularly small businesses and residential customers, to mail letters, flat, and other small prepaid items.

Another concern is that the removals that occurred over the summer were very uneven in terms of geographic area. The OIG Report on the Work Hour Reduction plan indicates that 74 percent of the removals that took place June 15, 2020 to August 31, 2020, were confined to the Southern and Western Areas.¹⁶ This suggests that the removals were subject to inequitable and disparate treatment that varied by region and may have not adhered to national policies and guidance.

It would be helpful if the Commission asked the Postal Service to provide more information about the removals. For example, the Commission could request information about the relationship between the box removals in 2020 and the Optimization plan for 2021; the current status of the Optimization plan; what studies (such as a cost-benefit analysis) the Postal Service has done about the plan; and if and

¹⁵ USPS OIG, “Operational Changes to Mail Delivery,” at 12

¹⁶ USPS OIG, “Operational Changes to Mail Delivery,” at 12.

when it intends to request an Advisory Opinion so the Commission has an opportunity to review the plan.

POST OFFICE CLOSURES AND HOURS

In late July of 2020, signs started appearing at numerous post offices indicating that the office would close for lunch or earlier in the day or completely. According to an article in Vice.com, union officials in the South Jersey District were told that 10 offices were dropping from nine hours to four, while another 30 were slated to close during lunch hours.¹⁷ In the Appalachian District at least a dozen offices in West Virginia were the subject of feasibility studies for closure, 26 offices were reducing hours from a full day to four, and another 31 were closing during lunch hours. News reports indicated that post offices in Berkeley, California; Knoxville, Tennessee; and Youngstown, Ohio, had announced similar plans.¹⁸

When West Virginia Senator Joe Manchin contacted the Postal Service about these announcements, he was told that the signs were incorrectly posted because of a “misunderstanding” between District officials and local postmasters. Senator Manchin

¹⁷ “USPS Plans to Slash Hours at Many Post Offices, Hoping to Save A Buck,” Vice.com, July 29, 2020, available at <https://www.vice.com/en/article/wxq47q/usps-plans-to-slash-hours-at-many-post-offices-hoping-to-save-a-buck>

¹⁸ “Need to mail a package in Berkeley? Be prepared to hunt, as many post offices have reduced hours,” Berkeleyside.com, July 27, 2020, available at <https://www.berkeleyside.com/2020/07/27/post-office-usps-closed-reduced-service-berkeley-ca;>

“Some Knoxville post offices cutting daily hours, halting Saturday window service,” wbir.com, July 24, 2020, available at <https://www.wbir.com/article/news/local/some-knoxville-post-offices-cutting-daily-hours-halting-saturday-window-service/51-0c93c744-d7b8-4db9-af0a-8cef580c557c;>

“Area post offices preparing customers for changes to lobby hours,” wkbn.com, July 22, 2020, available at <https://www.wkbn.com/news/local-news/area-post-offices-preparing-customers-for-changes-to-lobby-hours/>

said the response he got from the Postal Service left him with even more questions: “Where are these post office locations that might be shut down or have their hours reduced? Why were these locations selected? Why wasn’t any of this information included in the letter as I requested?”¹⁹

On July 7, 2020, a presentation was given at postal headquarters that included a slide that appears to indicate that the Work Hour Reduction plan included reducing window hours at 11,944 Level 18 and Level 20 post offices by 96 minutes and at 5,656 Level 18 offices by 34 minutes. Here is the slide from the July 7, 2020 presentation:²⁰

Case 1:20-cv-02340-EGS Document 59-10 Filed 10/19/20 Page 25 of 32

Retail and Customer Service- Function 4

Work Hour Reduction Target							
LDC	Description	Strategy	Action	Variance to Earned (YTD Week 36)	EOY Projected Earned	FY 21 Target Opportunity	Daily Minutes Per Office
43	Manual Distribution	Align clerk schedule to match workload	Reduce LDC 43 Overtime from 16.32% to 12% <ul style="list-style-type: none"> • Higher level approval with DM for NSD • Align bid jobs with Customer Service Variance (CSV) earned workhours Eliminate pre-tour Overtime Increase Delivery Point Sequence % - reduce manual mail <ul style="list-style-type: none"> • Address Management System /D-Smart/Identify leakage Increase Productivity <ul style="list-style-type: none"> • Manage Letter, Flat and Parcel Operations • Match schedule to first truck (15 mins)/sort within 10 minutes • PM parcel distribution – capture down time • New employees process parcels <ul style="list-style-type: none"> • Leverage technology/Distribution Scheme Sorter (DSS) for scheme • Sunday <ul style="list-style-type: none"> • Increase parcel productivity 208/hr. to 270/hr. • Clerk start time to align with mailers drops • Clock ring Hygiene (Passports/Package pickup/Left notice/PO Box maintenance) • Post Office Box <ul style="list-style-type: none"> • Review Bids – no designated POB clerk • PO Box Optimization 	2.5M	3.5M	2.2M	54 mins (11,944 CSV OFFICES)
44	Post Office Box Distribution		1.7M	2.4M	1.1M		
45	Retail	Align retail hours/operations to customer demand	Reduce LDC 45 OT to 10.61% to 8% <ul style="list-style-type: none"> • Level 18/20 Customer Service Variance (CSV) – expand lunch break by 1 hour (split shift) • Match workhours to earned workload • Reduce full window service hours (AM/PM) Split work week – MWF / TUTHS, Use of technology • Alternate Access points (CPU, Approved Shippers, CMRAs) 	5.9M	8.5M	5.83M	96 mins (11,944 CSV OFFICES)
47	Admin/clerk	Align Level 18 Postmaster productivity to earned	Perform clerk work up to 15 hours/week Expand lunch break by 1 hour lunch Modified Level 2 reviews for all Small Office Variance (SOV) offices	740K	1.1M	968K	34 mins (5,656 SOV level 18s)
Total				10.8M	15.5M	10.1M	150 min (CSV) 34 min (SOV)

¹⁹ “USPS official tells Manchin WV Post Offices aren't closing – yet,” Charleston Gazette-Mail, August 2, 2020, available at https://www.wvgazettemail.com/news/usps-official-tells-manchin-wv-post-offices-arent-closing---yet/article_9c66a2ec-21c4-5796-bcf8-c11d29ad0eda.html

²⁰ As noted above, at 6, footnote 13, the Work Hour Reduction plan was the subject of presentations at meetings of USPS leadership, on June 26, 2020, July 7, 2020, and July 10, 2020; these presentations were made public as exhibits in *New York v Trump*, 1:2020cv02340, available at <https://docs.google.com/viewerng/viewer?url=https://www.savethepostoffice.com/wp-content/uploads/2020/10/USPS-presentations-6-26-20-7-7-20-7-10-20.pdf&hl=en>.

The OIG report about the Work Hour Reduction plan, it may be noted, contains a list of the 57 strategies in the plan, and two appear to refer to this reduction of hours at post offices. One item reads “Retail – Add/Expand Lunch Breaks Based on Workload,” and another reads “Align Retail Workhours to Customer Demand/Reduce Full Window Service/Split Work Week.”²¹

While the OIG was apparently made aware of the plan to reduce hours at thousands of post offices, the Postal Service has provided no information to the public about such a plan, even though it could affect more than half of the 31,330 USPS-operated post offices.²² It is possible that the notices posted at numerous post offices over the summer represented the first step in implementing this plan.

In 2012, the Postal Service began implementing a similar plan to reduce hours at thousands of post offices, the Post Office Structure Plan (POStPlan). In April 2016, the GAO did a study of POStPlan and found several problems with the cost savings estimate the Postal Service had projected. For example, the Postal Service had not done a rigorous analysis of the potential impact of reduced hours on retail revenue. As the GAO observed, “Without reliable data and quality methods for calculating the potential savings USPS expects to achieve through its initiatives, the actual savings they achieve, and the effects on revenue, USPS officials and oversight bodies may lack

²¹ USPS OIG, “Operational Changes to Mail Delivery,” at 31.

²² Docket No. ACR2020, United States Postal Service, FY 2020 Annual Compliance Report, January 29, 2020, at 60, available at <https://www.prc.gov/docs/115/115612/USPS%20FY20%20Annual%20Compliance%20Report.pdf>

accurate and relevant information with which to make informed decisions regarding future cost-saving efforts in a time of constrained resources.”²³

Given the widespread, national impact such an initiative would have, it would be helpful if the Commission asked the Postal Service to provide more information about its plan to reduce post office hours, the current status of the plan, what kind of studies (such as the cost-saving analysis recommended by the GAO) the Postal Service has done to assess the plan and its feasibility, value and risks, and if and when it plans to request an Advisory Opinion, as the Postal Service did with POSTPlan.

SERVICE PERFORMANCE

In Commission Information Request No. 1 for the 2020 ACD, the Commission has already asked the Postal Service to provide information about the relationship between service performance and various aspects of postal operations, such as employee availability, overtime, and transportation.²⁴ Most of the questions are about service performance in FY 2020, but several cross over to the Postal Service’s plans for FY 2021.

While service performance in FY2021 will be the subject of next year’s ACD, it would be useful for the Commission to examine the problems with poor performance that have continued into FY 2021. The service performance reports shared with

²³ U.S. Postal Service: Post Office Changes Suggest Cost Savings, but Improved Guidance, Data, and Analysis Can Inform Future Savings Efforts, GAO-16-385: April 29, 2016, available at <https://www.gao.gov/assets/680/676884.pdf>

²⁴ Docket No. ACR202, Commission Information Request No. 1, January 8, 2021, available at <https://www.prc.gov/docs/115/115795/CIR%20No.%201.pdf>

Congress and submitted in *Jones v USPS* indicate that weekly scores for First Class mail have averaged about 80 percent since the beginning of the first quarter of 2021, and during December, about 68 percent.²⁵ There have also been numerous news reports about mail delays and the problems they are causing customers, such as late medications and penalty fees on late credit card and other bill payments.²⁶

While it is understood that the ACD addresses service by fiscal year, it cannot escape the Commission's attention that public and Congressional concerns regarding the Fiscal Year 2020 service quality merged with concerns over the subsequent election season and holiday season during FY 2021. It is within the Commission's purview to evaluate the extent to which service changes, with pandemic impacts, resulted in cross year impacts to performance. It may also be noted that this issue has been previously addressed by the Commission. Last year, as part of the compliance review for FY 2019, I submitted a motion for an information request concerning service performance data for a period outside of FY 2019.²⁷ The Postal Service objected,²⁸ but the Commission went

²⁵ USPS FY20 Q2 - FY21 Q2 To-Date Service Performance for Market-Dominant Products Nation - By Week, submitted in *Jones v USPS*, Case 1:20-cv-06516-VM, Document 111-1, January 8, 2021, available at

https://drive.google.com/file/d/1_JP5Mnhyc1SFHiLMu2N5j5Vb7YSmOiMj/view?usp=sharing

²⁶ See, for example, "Patients may have seen 'significant' delays in medicine deliveries by USPS, Senate report finds," Washington Post, September 9, 2020 available at <https://www.washingtonpost.com/us-policy/2020/09/09/usps-prescription-drug-delays-investigation/>; "Missing bills, late fees and more as delays in mail delivery at USPS continue," wmar2news.com, January 4, 2021, available at <https://www.wmar2news.com/news/local-news/missing-bills-late-fees-and-more-as-delays-in-mail-delivery-at-usps-continue>; "USPS delays continue, angering residents, small businesses with late bills," kpvi.com, January 16, 2021, available at https://www.kpvi.com/news/national_news/usps-delays-continue-angering-residents-small-businesses-with-late-bills/article_d3353044-4bb5-55c2-a62e-c3377830b3e1.html

²⁷ Steve Hutkins' Motion for Issuance of Information Request, January 21, 2020, available at https://www.prc.gov/docs/114/114309/Hutkins_Motion_Service_Performance.pdf

²⁸ Answer of the United States Postal Service in Response to Steve Hutkins' Motion for Issuance of Information Request, January 21, 2020, available at <https://www.prc.gov/docs/111/111937/Answer%20Hutkins%20Info%20Motion.pdf>

ahead and requested this information.²⁹ In its analysis of the issue, the Commission observed, “The relevance and materiality of the information sought are particularly apparent in light of service performance issues, which are not isolated to a particular fiscal year and have prompted the Commission to obtain information from the Postal Service outside the usual 90-day annual compliance review timeframe in a number of past proceedings.”³⁰

It would be helpful if the Commission asked for more data about the number of employees who have been unavailable for work due to COVID-related problems, who have tested positive for COVID, and who have died from COVID. These numbers should be shown on a weekly basis, for FY 2019, FY 2020, and the first quarter of FY 2021. This will help show correlations, or lack of correlations, between employee issues and service performance. This type of statistical analysis, which already exists within the Postal Service, would not impair any personal privacy interests.

The Postal Service should also provide more variance data for service performance. The variance reports the Postal Service shares with the Commission show the percentage of mail pieces that arrive on time and that arrive with one extra day, two extra days, and three extra days (“tail of the mail”). The Commission has previously considered expanding variance reports beyond three days to address concerns about exceedingly late mail, but it determined that three days was sufficient to provide an indication of potential “tail of the mail” problems.³¹ In pre-COVID years,

²⁹ Order Granting Motion for Information Request, Order No. 5671, September 3, 2020, available at <https://www.prc.gov/docs/114/114464/order5671.pdf>

³⁰ Order No. 5671, September 3, 2020, at 5.

³¹ Docket No. RM2009–12, Order No. 465, May 25, 2010, at 47, available at https://www.prc.gov/Docs/68/68200/Order_No_465.pdf

nearly all mail has arrived with three extra days, so there was perhaps not much need to look beyond three days, but that has not been the case over the past several months. For example, the variance report for the week of December 26, 2020, shows that for single-piece First Class mail with a 3-day standard the on-time overall score was 37.56 percent; with plus-one day, 58.24 percent; with plus-two days, 67.26 percent, and with plus-three days, 73.33 percent.³²

It would be helpful if the Postal Service provided variance data that extends beyond three days. The Commission should request weekly variance reports on First Class Mail, Marketing Mail, and Periodicals, on a weekly basis, district by district (or, if that is too burdensome, area by area), with data for ten days extra or as many days as are necessary for 99 percent of the mail to be accounted for.

PROPOSED INFORMATION REQUESTS

1. The Postal Service provided a list of post offices suspended at the end of FY 2020 in a library reference.³³ Please provide an updated Excel spreadsheet containing the following information for each suspended post office:
 - a. City;
 - b. State;

³² Weekly national scores and service variance for First-Class Mail, submitted in *Jones v USPS*, Case 1:20-cv-06516-VM, Document 111-2, January 8, 2021, available at <https://drive.google.com/file/d/1nCW25cYQPfzX5DKP1CFB9MJCTLh3AiTZ/view?usp=sharing>; I have converted the pdf to an Excel spreadsheet, available at https://docs.google.com/spreadsheets/d/1J-B_ZBfA5fiY7RkLFEQY3EOtM7T6DQTa/edit#gid=1281911737

³³ Docket No. ACR2020, Library Reference USPS-FY20-33, December 29, 2020, Excel file "PostOfficesFY2020.xlsx," tab "Suspended End of FY20," available at <https://www.prc.gov/dockets/document/115699>

- c. ZIP Code;
 - d. Date Suspended;
 - e. Date Reopened (if applicable);
 - f. Suspension Reason;
 - g. Discontinuance Proposal Posting Date;
 - h. Date of Community Meeting; and
 - i. Date of Posting Final Determination to Discontinue.
2. Please provide Excel spreadsheets including Office Name (or other appropriate identifier), Location (City and State), and 5-Digit ZIP Code for the following:
 - a. Community Post Offices (CPOs) in existence at the beginning of FY 2020;
 - b. CPOs opened during FY 2020;
 - c. CPOs closed during FY 2020; and
 - d. CPOs in existence at the end of FY 2020.
3. Please provide Excel spreadsheets including Office Name (or other appropriate identifier), Location (City and State), and 5-Digit ZIP Code for the following:
 - a. Contract Postal Units (CPUs) in existence at the beginning of FY 2020;
 - b. CPUs opened during FY 2020;
 - c. CPUs closed during FY 2020; and
 - d. CPUs in existence at the end of FY 2020.
4. Please provide Excel spreadsheets including Office Name (or other appropriate identifier), Location (City and State), and 5-Digit ZIP Code for the following:
 - a. Village Post Offices (VPOs) in existence at the beginning of FY 2020;
 - b. VPOs opened during FY 2020;

- c. VPOs closed during FY 2020; and
 - d. VPOs in existence at the end of FY 2020.
5. In Docket No. ACR2015, the Postal Service filed an Excel spreadsheet containing data on the Collection Point Management System.³⁴ Please file an updated library reference with FY 2020 data.
 6. In Docket No. ACR2015, the Postal Service filed an Excel spreadsheet containing density test data from the Collection Point Management System.³⁵ Please submit an updated library reference with FY 2029 data.
 7. Please respond to the following questions regarding collection box removals.
 - a. Please confirm that as of June 26, 2020, the Postal Service had a Collection Box Optimization plan that involved removing 29,618 boxes. If not confirmed, please explain why it appears in the presentation given on June 26, 2020, at USPS Headquarters.
 - b. What is the relationship between the Optimization plan referenced in the June 26th presentation and the box removals that took place later in the summer? Did Area Vice Presidents who participated in the June 26th meeting direct local management to get started on the plan during the summer?

³⁴ Docket No. ACR2015, Public Material Provided in Response to Chairman's Information Request No. 6, Library Reference USPS-FY15-45, folder "ChIR.6.Q.2.CPMS," Excel file "ChIR.6.Q2a.CPMS.xlsx," February 3, 2016, available at <https://www.prc.gov/dockets/document/94901>

³⁵ Docket No. ACR2015, Public Material Provided in Response to Chairman's Information Request No. 6, Library Reference USPS-FY15-45, folder "ChIR.6.Q.2.CPMS," Excel file "ChIR.6.Q2b.Density Test.xlsx," Feb. 3, 2016, available at <https://www.prc.gov/dockets/document/94901>.

- c. Does the Postal Service plan to implement the Collection Box Optimization plan during FY 2021?
 - d. Has the Postal Service completed a pilot, study, and/or analysis of the potential impacts of this plan? If yes, please provide the pilot test results, study, and/or analysis.
 - e. What will be the density threshold that determines which boxes will be culled?
 - f. If the Postal Service has prepared a list of those boxes it intends to remove, please provide an Excel spreadsheet of their locations as presented in the Box Schedule Report in the CPMS database.
 - g. What will the Postal Service do to ensure, when it is determining which boxes to remove, that each region of the country is treated fairly and equitably and not subject to disparate treatment?
 - h. Does the Postal Service intend to request an Advisory Opinion before proceeding to implement this plan?
8. Please respond to the following questions regarding post office hours of operation.
- a. Please confirm that as of July 7, 2020, the Postal Service had a plan that to reduce window hours at approximately 17,000 post offices. If not confirmed, please explain why such a plan appears to be referenced in the presentation given on July 7, 2020, at USPS Headquarters materials.
 - b. What is the relationship between the plan to reduce hours referenced in the July 7th presentation and the notices that were posted at numerous

post offices over the summer about reduced hours? Did Area Vice Presidents who participated in the July 7th meeting direct district management to get started on this plan during the summer?

- c. Does the Postal Service intend to implement a plan to reduce hours at thousands of post offices during FY 2021?
 - d. Has the Postal Service completed a pilot, study, and/or analysis of the potential impacts of this plan? For example, has the Postal Service done a study of how much revenue could be lost if the plan were to be implemented? If yes, please provide the pilot test results, study, and/or analysis.
 - e. What will the Postal Service do to ensure, when it is determining which post offices to reduce hours, that each region of the country is treated fairly and equitably and not subject to disparate treatment?
 - f. If the Postal Service has prepared a list of those post offices where hours will be reduced, please provide an Excel spreadsheet of these offices and their full addresses.
 - g. Does the Postal Service intend to request an Advisory Opinion before proceeding to implement this plan?
9. Please provide an Excel spreadsheet covering the period FY 2019, FY 2020, and the first quarter of FY 2021, on a monthly basis, with columns for the following:
- a. year;
 - b. month;
 - c. USPS Area;

- d. number of career employees;
 - e. number of non-career employees;
 - f. number of workhours for career employees;
 - g. number of workhours for non-career employees;
 - h. number of overtime hours for career employees;
 - i. number of overtime hours for non-career employees.³⁶
10. Please provide an Excel spreadsheet covering the period FY 2019, FY 2020, and the first quarter of FY 2021, on a monthly basis, with columns for the following:
- a. year;
 - b. month;
 - c. USPS Area;
 - d. area of operation (mail processing, customer service, and city delivery);
 - e. the employee availability rate;
 - f. the number who tested positive for COVID-19;
 - g. the number who died from COVID-19.³⁷
11. Please provide an Excel spreadsheet covering the period FY 2019, FY 2020, and the first quarter of FY 2021, showing variance data for First Class Mail, Marketing Mail, and Periodicals on a weekly basis, similar to that which the

³⁶ The Postal Service already provides the workhour total and the number of career and non-career employees in its monthly Financial Reports to the Commission; this request simply asks for some additional data.

³⁷ Note Figure 4 in USPS OIG, "Operational Changes to Mail Delivery," at 15, which contains three charts illustrating the employee availability rate in these three areas of operation on a weekly basis for several months during FY 2019 and FY 2020. The source is OIG analysis data extracted from the Postal Service's Enterprise Data Warehouse (EDW).

Postal Service has been sharing in *Jones v USPS*.³⁸ Please include scores for the Nation and USPS Areas, and for First Class Mail, please provide the composite scores as well as scores disaggregated by pre-sort overnight, two-day, and three-to-five days and single-piece two-day and three-to-five days. Rather than limiting the report to three days after the service standard, please extend the data for up to ten days extra or as many extra days as are necessary until 99 percent of the mail is accounted for.

Respectfully submitted,

By: /s/ Steve Hutkins
Steve Hutkins
PO Box 43
Rhinecliff, NY 12574
ssh1@nyu.edu

³⁸ See Case 1:20-cv-06516-VM, Document 111-2, January 8, 2021, available at <https://drive.google.com/file/d/1nCW25cYQPfzX5DKP1CFB9MJCTLh3AiTZ/view?usp=sharing> converted an Excel spreadsheet, available at https://docs.google.com/spreadsheets/d/1J-B_ZBfA5fiY7RkLFEQY3EOtM7T6DQTa/edit#gid=1281911737