

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

FIRST-CLASS MAIL AND PERIODICALS
SERVICE STANDARDS CHANGES, 2021

DOCKET No. N2021-1

MAILERS HUB
REVISED INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENT
UNITED STATE POSTAL SERVICE WITNESS CURTIS WHITEMAN
(MH/USPS-T-2-1)
(May 20, 2021)

Pursuant to the Postal Regulatory Commission's *Rules of Practice and Procedure* (39 CFR 3010.311) and Presiding Officer's Ruling No. N2021-9, issued May 19, 2021, Mailers Hub respectfully submits the following revised interrogatories, numbered (MH/USPS-T2-1-3), to United States Postal Service witness Curtis Whiteman (USPS-T-2) and requests a timely answer under oath. (As reference, the interrogatory numbers used in POR No. N2021-9 are shown in parentheses.) If an interrogatory can be more accurately answered by a different witness, we request that it be redirected accordingly or, if necessary, to the Postal Service for an institutional response.

Please contact the undersigned with any questions.

Respectfully submitted

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MAILERS HUB INTERROGATORIES TO
UNITED STATES POSTAL SERVICE WITNESS CURTIS WHITEMAN (USPS-T-2)
(MH/USPS-T2-1-3)

MH/USPS-T2-1. [POR #1] Please refer to your testimony on page 8, lines 10 through 14.

a. Please explain the statement that the “service standard change will result in a restructuring of the Postal Service’s transportation network,” specifically to clarify whether the Postal Service’s decision to transport more mail by surface necessitated revising service standards, or whether the revised service standards were developed first and, in turn, drove changes in the transportation network.

MH/USPS-T2-2. [POR #4] Please refer to your testimony on page 8, lines 10 through 14.

a. Please confirm that no zoned rates or destination entry discounts currently available based on mail entry or processing through the current NDC network will be changed because of the proposed service standard changes or related network adjustments.

b. In not confirmed, please explain the changes in zoned rates or destination entry discounts that will result from the proposed service standard changes and/or related network adjustments.

MH/USPS-T2-3. [POR #7] Please refer to Part II of Witness Hagenstein’s testimony and your testimony on Pages 11 through 13.

a. Please confirm that the calculated savings in surface transportation assumed:

- i. all vehicles (trucks) would be the same size, with the same capacity;
- ii. cube utilization would be 45.1% of the capacity of a 53-foot trailer;
- iii. loads would consist solely of APCs with an average utilization of 75%; and
- iv. no loads would be in other containers or bedloaded.

b. If those assumptions cannot be confirmed please explain what assumptions were used.