

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 STEPHEN B. HAGENSTEIN
(MH/USPS-T-3-1)
(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 interrogatories, numbered (MH/USPS-T3-1-4), to United States Postal Service witness Stephen B. Hagenstein (USPS-T-3) 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 STEPHEN B. HAGENSTEIN (USPS-T-3)
(MH/USPS-T3-1-4)

MH/USPS-T3-1. [POR #1] Please refer to your testimony on page 3, lines 19 through 23, and on page 4, lines 1 through 9.

a. Please explain the criteria used by the Postal Service to determine whether transportation service will be provided by its own drivers (PVS) or by contract drivers (HCR).

b. Please explain why, if “On average, HCR transportation is less expensive than PVS,” HCR would not be the preferred choice for transportation service.

MH/USPS-T3-2. [POR #3] Please refer to your testimony on page 5, lines 1 and 2 and 21 through 23.

a. Please explain how it is determined that a truck is “routinely less than 60 percent full.”

b. Please confirm that such a level of utilization would be in accordance with planned utilization and, if so, how the 60 percent level was chosen. If that cannot be confirmed, please explain the load that is expected “routinely.”

c. Please explain the circumstances under which contracted transportation becomes “over and under-utilized.”

d. Please explain what steps are taken to monitor for, and to correct over- or under-utilization of vehicle capacity; to verify that such steps were effective; and to take further actions as necessary to prevent or minimize over- or under-utilization of vehicle capacity.

MH/USPS-T3-3. [POR #5] Please refer to your testimony on page 10, line 5.

a. Please explain why the assumption was made that “the average APC would be 75 percent full.”

b. Please explain why a higher figure was not selected in order to support the objective of taking “full advantage of the truck’s carrying capacity.”

MH/USPS-T3-4. [POR #8] Please refer to your testimony on page 15, lines 10 through 13. Please explain the assumptions regarding vehicle size and capacity.

a. Please explain whether smaller trucks (“5-tons”), or different size trailers (40-, 45-, 48-, or 50-foot) were used as variables or, if not, why not.

b. Please explain whether the model was used or allowed to determine whether smaller trucks could be used to provide direct service between origin/destination pairs instead of assigning the related volume to a larger vehicle on an indirect routing.

c. In order to provide “flexibility,” please explain whether the model allowed for the use of trucks of different sizes on a routing between an origin/destination pair, based on fluctuations in volume. If not, please explain why such “flexibility” would not be desirable.

d. Please explain why the “Maximum volume per 53-foot trailers was modeled as 1,575 cubic feet” if, according to a Guide to Truck Trailers (http://www.iccb.org/iccb/wpcontent/pdfs/adulted/tdl_bridge_curriculum/tdl_context_math/tdl_math_resource_file/Truck_Trailer_Guide.pdf), the interior capacity of a 53-foot trailer is 3,489 cubic feet.

e. Please explain why the model assumed utilization of only 45.1% of the capacity of a 53-foot trailer.

f. Please confirm that the model assumed that all loads on all trucks would be in APCs, that no modeled loads were in other than APCs that were “75 percent full,” and that no modeled loads were bedloaded. If these cannot be confirmed, please explain the assumed loads.