

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

FIRST-CLASS MAIL AND PERIODICALS  
SERVICE STANDARD CHANGES, 2021

Docket No. N2021-1

**RESPONSES OF THE UNITED STATES POSTAL SERVICE WITNESS ROBERT  
CINTRON TO GREETING CARD ASSOCIATION INTERROGATORIES  
(GCA/USPS-T1-1-3)  
(May 20, 2021)**

The United States Postal Service hereby provides its responses to the Greeting Card Association's Interrogatories to United States Postal Service Witness Cintron, issued on May 13, 2021. Each question is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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May 20, 2021

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS CINTRON TO  
GREETING CARD ASSOCIATION INTERROGATORIES**

**GCA/USPS-T1-1:** Your prefiled testimony cites decline in First-Class Mail volume as a principal reason for the proposed changes in services standards.

- (a) Does your testimony assume that each First-Class Mail product will, for the planning horizon you considered, remain of the same description as it is currently?
- (b) Is it your understanding that the Postal Service's plan to change First-Class Mail service standards is based on the assumption that each First-Class Mail product will, for the planning horizon considered in formulating the plan, remain of the same description as it is currently?

**RESPONSE:**

- a. Yes, my testimony assumes each First-Class Mail product remains the same description as currently.
- b. My understanding is that each First-Class Mail product will remain the same description as it is currently.

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**GCA/USPS-T1-2:** Can you confirm that in developing the proposal to change First-Class Mail service standards, the Postal Service did not consider modifications to existing First-Class Mail products, or creation of new First-Class Mail products, the aim of which would be to retard or arrest the decline in First-Class volume?

If you do not confirm, please describe any such modifications or new products which were considered, and explain (i) whether they factored into the proposal to change service standards and (ii) if they factored into the proposal to change service standards, how they are reflected in the proposal.

**RESPONSE:**

Confirmed

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**GCA/USPS-T1-3:** At page 25 of USPS-T-5, Mr. Thress describes an observation that household mailers are more affected by delivery schedules than non-household mailers. (a) In preparing your prefiled testimony, were you aware of this observation? (b) If your answer to part (a) is affirmative, please (i) state whether your prefiled testimony makes use of this observation; and (ii) if it does, describe how the testimony makes use of it.

**RESPONSE:**

- a. In preparing my testimony, I was aware of this observation.
- b. i. My testimony does not make use of this observation.