

May 29, 2021

Postal Regulatory Commission
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United States Postal Service
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475 L'Enfant Plaza SW
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United States Postal Service Board of Governors
Michael Elston, Secretary of the Board
475 L'Enfant Plaza SW
Washington, DC 20260-1000

Subject: United States Postal Service
Proposed 10-Year Plan
Docket N2021-1
Statement of Position

Before I list my concerns with the USPS Proposed 10-Year Plan, I would like to express my reservations regarding Postmaster General Louis DeJoy. The reason for expressing these reservations is that the changes in the Proposed 10-Year Plan need to be scrutinized in light of the reported history and past unethical behavior of Mr. DeJoy. Following are a few examples of reported conduct by Mr. DeJoy that causes concern and suspicion regarding the proposed changes in the Proposed 10-Year Plan:

- Results of a 20-year old audit noted that Mr. DeJoy's former company, New Breed Logistics that he sold to XPO Logistics in 2015, unethically received non-competitive contracts from the USPS for mail equipment transport. It is estimated that had these contracts been bid competitively, savings of approximately \$53 million of taxpayer money would have been realized.
- Starting in the summer of 2020 and extending through Election Day, Mr. DeJoy spearheaded a campaign to significantly slow the delivery of mail, affecting the date that mail-in ballots were received by voters and by the election office.
- Allegations by former employees of campaign finance violations when they were compensated for cash donations to the Republican Party's candidates.

Following are my concerns related to the Proposed 10-Year Plan. The page numbers are in reference to the part of the Plan, entitled "A High Performing Future: Key Strategies".

- A. "Service Standard Changes to Improve Reliability" (starting on pg 25)

1. Have the mail carriers commented on these proposals?
 2. Pg 26, 2nd paragraph – “Our Plan is to modify existing service standards for First-Class Mail Letters and Flats from a current 1- to 3-day service standard within the continental United States to a one-to-five-day service standard.”
 - a. Presently I have experienced a significant slowdown in mail delivery since Mr. Dejoy became Postmaster General. First-Class mail letters that I send to my daughters near Charlotte and Cleveland have been taking in excess of three-to-four days to arrive. So the “current 1- to 3-day service standard” that I’m paying postage for actually does not exist today. The service has already morphed to a one-to-five-day service standard without a decrease in the postage rate.
 - b. The present delay in receiving mail affects medications that I receive through the mail, as well as other important correspondence.
 - c. Increasing the time to deliver First-Class mail will drive people away from using the USPS to mail items. They will turn to electronic mail systems instead, further negatively impacting the USPS’s profitability.
 3. Pg 26, 2nd paragraph – “The principal impact of the proposal would be to enable 43 percent of that portion First-Class Mail which is currently transported through the air to shift to surface transportation.”
 - a. Presently there’s a shortage of truck drivers, so the feasibility of this recommendation should be studied.
 - b. It is suspicious that Mr. Dejoy would recommend the change to truck transport, since this is the industry that he came from and probably has ties to.
 - c. Air transport is probably more efficient and timely than the equivalent number of trucks that would be needed. There should be studies done to prove this.
 - d. Truck delivery time is unreliable as trucks experience significant delivery delays due to poor road conditions in winter weather.
 4. Pg 26, 2nd bullet under “The following is a summary of the impacts of the new service standards:”
 - a. “First-Class Mail traveling within a local area (up to a three-hour drive time) will not experience a service standard change and would still be delivered within two days.” This is not happening today, as evidenced by the approximate four day delivery time for my letters to get to Charlotte.
 5. Pg 26, 3rd bullet under “The following is a summary of the impacts of the new service standards:”
 - a. “61 percent of current First-Class Mail volume ...will stay at its current standard.” From a customer’s perspective, that’s an unacceptably poor percentage.
- B. “Adopt Disciplined Operating Principles” (pg 28)
1. Pg 28, 1st sentence –“We will stabilize and recalibrate the operating plans at our facilities to be achievable, predictable and efficient by adopting best practices.” Give examples of these “best practices”.
- C. “Accelerate Investment in Package Sorting and Material Handling Equipment” (pg 28)

1. Before investing in this new equipment, explain why numerous mail sorting machines worth millions of dollars were dismantled and the parts thrown away leading up to the 2020 election. And why were numerous blue mail collection boxes removed from streets across America leading up to the 2020 election?
- D. “Fully Optimized Surface and Air Transportation Network” (pg 30)
1. Pg 30, last sentence – “We will also shift volume from an unreliable and costly air network to a better managed surface network.”
 - a. Show documentation as to the costs per volume of mail for air vs. surface network.
 - b. Communicate this proposal with the air industry and obtain their response.
- E. “Deploy State-of-the-Art Logistics Platform” (pg 30)
1. Pg 30, last sentence – “We will also implement an advanced tool for carrier solicitation and contract management to promote a seamless process to solicit and engage carriers.”
 - a. Has USPS engaged with the trucking industry to confirm their capacity to handle what USPS is proposing?
 - b. There is concern with Mr. DeJoy’s past history of non-competitive contracts in light of these new proposals.
- F. “A Modernized Post Office Network” (pg 34)
1. Pg 34, last sentence – “More than 95 percent of the American population has a Post Office within five miles of where they live, and 99 percent of the population is covered within a 10-mile radius.” How many of the existing Post Offices are slated to be closed/consolidated?
- G. “Align Retail Network to Meet Evolving Customer Needs” (pg 34)
1. Pg 34, bottom of page – “...we will further align Post Office hours of operation to local use.” What does this mean? Post Offices open for shorter duration each day?
 2. Pg 35, 1st bullet at top – “Evaluate and consolidate low-traffic stations and branches of city Post Offices into nearby full-service retail Post Offices.”
 - a. How many of the existing Post Offices are slated to be closed/consolidated?
 - b. Will there be public hearings to meet with the communities before closing a Post Office?
- H. “Promote Diversity and Equity” (pg 37)
1. Pg 37 – What are the demographics by gender and race for USPS management/leadership level vs. rank and file worker level?
- I. In general, when I read the term “optimization” in the Plan, I’m seeing a degradation of the mail delivery service for the same or higher costs to the customer. This is unacceptable.

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