

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 MAILERS HUB'S REVISED INTERROGATORY MH/USPS-T2-1  
REDIRECTED FROM WITNESS CURTIS  
(MH/USPS-T2-1)  
(June 1, 2021)**

The United States Postal Service hereby provides its responses to Mailers Hub's Interrogatories MH/USPS-T2-1 to United States Postal Service Witness Curtis, redirected to Witness Cintron, issued on May 20, 2021. Each question is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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June 1, 2021

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS CINTRON TO  
MAILERS HUB'S INTERROGATORY MH/USPS-T2-1 REDIRECTED FROM  
WITNESS CURTIS**

**MH/USPS-T2-1:** 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."

**RESPONSE:** The Postal Service's decision to transport more mail by surface transportation initiated the service standard change modeling and analysis.