

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

FIRST-CLASS MAIL AND PERIODICALS
SERVICE STANDARD CHANGES, 2021

Docket No. N2021-1

**RESPONSE OF THE UNITED STATES POSTAL SERVICE INSTITUTIONAL
WITNESS (SHARON OWENS) TO QUESTION 2 OF REVISED MAILERS HUB
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO
UNITED STATES POSTAL SERVICE WITNESS WHITEMAN
(MH/USPS-T2-2)
(June 1, 2021)**

The United States Postal Service hereby provides the response of institutional witness Owens to Question 2 of Mailers Hub Revised Interrogatories and Requests for Production of Documents to the United States Postal Service witness Whiteman (GCA/USPS-T2-2), issued as of May 20, 2021.¹ The question is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Anthony Alverno
Chief Counsel, Global Business & Service
Development

Jeffrey A. Rackow

475 L'Enfant Plaza, S.W.
Washington, D.C. 20260-1101
(202) 268-6687
jeffrey.a.rackow@usps.gov
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¹ Under Order No. 5901, this response is due June 1, 2021.

**RESPONSE OF UNITED STATES POSTAL SERVICE INSTITUTIONAL WITNESS
OWENS TO MAILERS HUB REVISED INTERROGATORIES
(REDIRECTED FROM WITNESS WHITEMAN)**

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.

RESPONSE:

- a. Not confirmed.
- b. The Postal Service understands “related network adjustments” in this context to refer to steps that would be necessary to implement the proposed service standard changes. The Postal Service has not decided, and has no current plans, to change zoned rates or destination entry discounts currently available based on mail entry or processing through the current Network Distribution Center (NDC) network in order to implement the proposed service standard changes or related network adjustments. The Postal Service does not seek an advisory opinion in this case about zoned rates or destination entry discounts. It would be speculative to predict if the Postal Service may decide at any time in the future whether to change zoned rates or destination entry discounts currently available based on mail entry or processing through the current NDC network in order to implement the proposed service standard changes or related network adjustments.