

Oppose exigent rate change request, alternatives to balance the budget.  
Public comment on Docket R2010-4 by Wayne Robey

While the USPS bases its request on “the dramatic, rapid and unprecedented decline in mail volume”, cites a revenue of \$68 billion in 2009 and projected FY 2011 deficit of \$7 billion, it admits that the requested exigent increase will not by itself eliminate the gap between revenue and expenses in FY 2011. In comparison, the change to five day delivery proposal (Docket N2010-1) is expected to save about \$3 billion a year (see USPS Library Reference N2010-1/1). Taken alone, neither of these changes are desirable or effective. Considering the historical rapid rises in rates which the PAEA was intended to dampen, **another rate increase is the least desirable solution.** If mail delivery to street addresses that now receive six deliveries/week was reduced to three/week rather than the five/week proposed in USPS Library Reference N2010-1/1 **but mail continues to be collected from blue street collection boxes where the boxes are not serviced by delivery carriers and at Post Offices**, the savings are likely to be about \$9 billion/year (estimated by extrapolation). This should be sufficient to avoid the projected FY 2011 deficit and pay back the current debt within a reasonable period of time. Additional savings may be obtainable as described by postal employee Bill Hall in his comment in docket N2010-1 (file Greetings Everyone.pdf). In my experience, an additional 0 to 2 days delay in mail delivery (up to 1 day delay when mail is not picked up by a delivery carrier) is not a problem. More urgent information tends to be delivered electronically already while UPS and FedEx already provide faster package delivery (with better delivery confirmation) to most locations. The proposed increase in package services rates would reduce the main advantage USPS has in this area. Businesses that rely on high mail volume generally have Post Office boxes and would be unaffected. In this 3 day/week scheme, I envisage delivery services operating six days a week as they do now but each street address would only receive them three days/week. (From a customer point of view delivery Monday, Wednesday, and Friday is preferable but probably not practical from the standpoint of employee scheduling.)

I urge the Commission to integrate the proposals in dockets R2010-4 and N2010-1 to produce adequate savings by delivery reduction rather than rate increases, and urge the Postal Service to more aggressively pursue waste reduction to prevent a reoccurrence of this problem as volume continues to fall.