

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

SIX-DAY TO FIVE-DAY STREET DELIVERY  
AND RELATED SERVICE CHANGES

DOCKET NO. N2010-1

RESPONSE OF PUBLIC REPRESENTATIVES' WITNESS LUTTRELL  
TO UNITED STATES POSTAL SERVICE INTERROGATORIES  
(USPS/PR-T-2-16, 18, 19, 20, 21 AND 22)

The Public Representatives hereby provide the response of witness Edward Luttrell to United States Postal Service interrogatories USPS/PR-T2-16, 18, 19, 20, 21 and 22, submitted on August 6, 2010. The interrogatories are reproduced in their entirety and are followed by a response.

Respectfully submitted,

PUBLIC REPRESENTATIVES

Patricia A. Gallagher  
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August 19, 2010

**RESPONSE OF PUBLIC REPRESENTATIVES' WITNESS LUTTRELL  
TO UNITED STATES POSTAL SERVICE INTERROGATORY USPS/PR-T2-16**

**USPS/PR-T2-16**

- (a) Please identify all persons at the Postal Regulatory Commission with whom you (or others in your organization) communicated in reference to the decision of your organization to file testimony in this docket.
- (b) Please identify all persons employed by any intervenor in this docket other than the Grange with whom you (or others in your organization) communicated in reference to the decision of your organization to file testimony in this docket.

**RESPONSE:**

- (a) The persons at the Postal Regulatory Commission who were communicated with in reference with the decision to file testimony in this docket were Public Representatives Patricia Gallagher, Kenneth Moeller and Lawrence Fenster.
- (b) No persons employed by any intervenor in this docket were communicated with in reference to the decision to file testimony in this docket.

**RESPONSE OF PUBLIC REPRESENTATIVES' WITNESS LUTTRELL  
TO UNITED STATES POSTAL SERVICE INTERROGATORY USPS/PR-T2-18**

**USPS/PR-T2-18**

Please refer to your testimony at page 4, line 5 and more fully describe the “innovative, single and small unit batch parcel post, package and bulk mail pricing policies” discussed here.

**RESPONSE:**

In general, I am referring to the pricing policies reflected in the offerings referred to on the United States Postal Service's web site ([www.usps.com](http://www.usps.com)) under the tab “All Products and Services” and subtab “Top Products and Services.” Our rural small business and family farm Grange members are concerned that elimination of Saturday delivery will reduce competition in this market for them.

**RESPONSE OF PUBLIC REPRESENTATIVES' WITNESS LUTTRELL  
TO UNITED STATES POSTAL SERVICE INTERROGATORY USPS/PR-T2-19**

**USPS/PR-T2-19**

Please refer to your testimony at page 4, lines 23-28.

- (a) Describe the means by which farm and rural customers place orders for “critical items” that are purchased by mail order.
- (b) Please confirm that some of the “critical items that farm and rural customers regularly purchase by mail order” are recurring or regularly scheduled purchases, as opposed to unanticipated or unforeseen purchases. If you do not confirm, please explain.
- (c) Describe the steps a farm or rural customer can take to expedite the postal delivery of “critical items” that a pharmaceutical or agricultural supplier might otherwise send via Parcel Post or Standard Mail.

**RESPONSE:**

- (a) In my experience, rural customers extensively utilize the mail to order prescription drugs, medical supplies and veterinary pharmaceutical products. These orders can be placed via telephone, via the Internet or, still commonly, via U.S. mail using a mail order form.
  
- (b) Confirmed that some items may be recurring orders or regularly scheduled purchases; however, in my experience, as health status changes, whether of animals or humans, the remedies, prescriptions, and supplements needed change as well. Weather can also change the needs and timeline of necessary items.
  
- (c) Rural customers have the option with many suppliers to request expedited service for critical items, but almost always at a higher price.

**RESPONSE OF PUBLIC REPRESENTATIVES' WITNESS LUTTRELL  
TO UNITED STATES POSTAL SERVICE INTERROGATORY USPS/PR-T2-20**

**USPS/PR-T2-20**

Please refer to page 5, lines 26-28 of your testimony.

(a) Please provide copies of all documents reflecting communications that the National Grange has received from government and non-government organizations during calendar years 2007, 2008 and 2009 in which those organizations have expressed a commitment to encouraging and/or requiring greater mail voting and participation in elections and referendums.

(b) Please provide copies of all documents reflecting communications that the National Grange has received from government and non-government organizations in calendar year 2010 in which those organizations — compared to years 2007-2009 — have expressed a diminished commitment to encouraging and/or requiring greater mail voting and participation in elections and referendums.

**RESPONSE:**

(a) and (b) There are no such documents. The concerns discussed in this testimony are a reflection of the grassroots concerns that have been addressed in the Grange's policy development process.

**RESPONSE OF PUBLIC REPRESENTATIVES' WITNESS LUTTRELL  
TO UNITED STATES POSTAL SERVICE INTERROGATORY USPS/PR-T2-21**

**USPS/PR-T2-21**

Please refer to your testimony at page 5. At line 8, you state that there is no “cost-effective” alternative to the postal service for delivery of live poultry chicks. Please provide data comparing postal delivery prices and the prices of the alternatives to which you refer for comparison.

**RESPONSE:**

At page 5, lines 9-10, my testimony continues: “Private carriers simply will not carry these shipments.” Thus, the requested data do not exist.

**RESPONSE OF PUBLIC REPRESENTATIVES' WITNESS LUTTRELL  
TO UNITED STATES POSTAL SERVICE INTERROGATORY USPS/PR-T2-22**

**USPS/PR-T2-22**

At page 5, line 1 of your testimony, you state that "Travel of 30 miles one way to reach a community where there is a doctor's office or a pharmacy is not unusual." Please provide any available data indicating the percentage of National Grange membership for whom it is not unusual to travel

- (a) more than 20 and up to 30 miles one way;
- (b) more than 10 and up to 20 miles one way;
- (c) more than 5 and up to 10 miles one way
- (d) up [to] 5 miles one way;

to reach a community where there is a Post Office, postal station or branch, community post office, or contract postal unit.

**RESPONSE:**

(a) – (b) The National Grange does not possess any such data because it does not collect or survey its membership for personal or business-related information such as this.