

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-2-14, 15 AND 17)

The Public Representatives hereby provide the response of witness Edward Luttrell to United States Postal Service interrogatories USPS/PR-T2-14, 15 AND 17 submitted on August 6, 2010. The interrogatories are reproduced in their entirety and are followed by a response.

Respectfully submitted,

PUBLIC REPRESENTATIVES

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**RESPONSE OF PUBLIC REPRESENTATIVES' WITNESS LUTTRELL  
TO UNITED STATES POSTAL SERVICE INTERROGATORY USPS/PR-T2-14**

**USPS/PR-T2-14**

Please refer to your testimony at page 4, lines 7-8. Is it your testimony that no “small, rural micro businesses” are able to negotiate favorable service concessions from for-profit postal competitors? If so, please provide detailed descriptions of the characteristics of businesses located in rural areas that are able to negotiate such concessions.

**RESPONSE:**

As clarification of this point, the grassroots feedback The National Grange has received through its policy development process indicates that members believe that small, rural businesses, as a rule, do not benefit from the bulk pricing that larger businesses may be able to obtain from for-profit competitors. The Grange does not collect personal or business related information from its membership, so I am not able to provide the requested examples.

**RESPONSE OF PUBLIC REPRESENTATIVES' WITNESS LUTTRELL  
TO UNITED STATES POSTAL SERVICE INTERROGATORY USPS/PR-T2-15**

**USPS/PR-T2-15**

Refer to your testimony at page 4, lines 11-12.

- (a) For the past three fiscal years, please provide all data reflecting National Grange members survey results relating to the frequency, quantity of time spent, and transaction costs associated with member visits to post offices.
- (b) Please provide all data reflecting National Grange member survey results relating to the frequency, quantity of time spent, and transaction cost changes anticipated in the event that the Postal Service implements the service changes under review in this docket.
- (c) Please explain and quantify the “extra time costs of visiting local post offices” that National Grange members they would experience if the Postal Service implements the service changes under review in this docket.

**RESPONSE:**

(a)-(c) The National Grange does not have the requested survey data, nor can it quantify “extra time costs” because, historically, it has not surveyed and/or collected this type of information from its membership. However, over the last 13 years, postal issues have been considered by numerous State Granges, as well as by the National Grange under its policy development process. For further clarification and background, for 143 years, the National Grange has used a deliberative process to determine and define the public policy concerns of its members. Unlike many traditional surveys or focus groups, the collective decision-making process employed by the Grange uses direct, participatory democracy and parliamentary procedure, similar to a legislative body or a traditional town hall meeting, to discern members’ public policy concerns. The Grange’s extensive experience with this policy development process has demonstrated that there is wider and more robust participation in this process when members are confident that their individual opinions, views, and statements are not memorialized or specifically attributed to them. Therefore, all adopted policies of the Grange, whether at the local, state or national level, reflect the outcome of this process.

**RESPONSE OF PUBLIC REPRESENTATIVES' WITNESS LUTTRELL  
TO UNITED STATES POSTAL SERVICE INTERROGATORY USPS/PR-T2-17**

**USPS/PR-T2-17**

Please refer to your testimony at page 4, line 11. Please identify all criteria that differentiate "small micro businesses such as family farmers" from other-sized family farm business operations.

**RESPONSE:**

Preliminarily, I note that at the 143<sup>rd</sup> annual convention of the National Grange, held last November in Grand Rapids, Michigan, the grassroots Grange delegates adopted the following policy defining a "family farm or ranch:"

The National Grange believes that a family farm is a business or enterprise involved in the production of food, fiber and related products or services that is owned and operated by the members of a family who make the management and financial decisions and supply part of the labor.

In terms of classifying farms by size, the U.S. Department of Agriculture's National Agricultural Statistical Service utilizes annual value of sales and number of acres farmed as measures of farm size. According to the USDA's NASS, almost 84% of the more than 2.2 million active farms in the United States are small to medium scale, sole proprietor farming operations, as measured by annual sales. Also, from my experience growing up in, and currently living in, a farming community in rural, Eastern Oregon, I believe the vast majority of the labor input resources on these farms and ranches are provided by the farmer and members of the farmer's family.