

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

RESPONSES OF PUBLIC REPRESENTATIVES' WITNESS LUTTRELL
TO UNITED STATES POSTAL SERVICE INTERROGATORIES
(USPS/PR-T-2-2, 3, 4 AND 5)

The Public Representatives hereby provide the response of witness Edward Luttrell to United States Postal Service interrogatories USPS/PR-T2-2, 3, 4 and 5 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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August 20, 2010

**RESPONSE OF PUBLIC REPRESENTATIVES' WITNESS LUTTRELL
TO UNITED STATES POSTAL SERVICE INTERROGATORY USPS/PR-T2-2**

USPS/PR-T2-2

Please refer to page 7, line 8 of your testimony. Identify the “various Southern states that have increased use of mail balloting in recent years.” For each state, please fully describe the changes in voting procedures to which you refer and provide citation to the state to the state statutes and regulations governing those procedures.

RESPONSE:

To my knowledge, Florida, Georgia, and North Carolina are southern states that have increased the use of mail balloting in recent years by allowing no-excuse absentee voting via the mail. These are the changes referred to. Support for the referenced states' practices is drawn, in part, from <http://votebymailproject.org>. I regret that the timetable for submitting this response and Grange resources have precluded developing a list of citations for each state.

**RESPONSE OF PUBLIC REPRESENTATIVES' WITNESS LUTTRELL
TO UNITED STATES POSTAL SERVICE INTERROGATORY USPS/PR-T2-3**

USPS/PR-T2-3

Please refer to your testimony at page 7, lines 21-22. Separately for each specific postal service change at issue in this proceeding (see USPS-T-1), please explain how and by whom that service could be “seen as discouraging minority rural residents in southern states from casting ballots in local state and national elections.”

RESPONSE:

The National Grange believes that any removal of services that makes voting-by-mail for rural voters, whether minority, disabled, living overseas or on active duty, or not less convenient, or burdensome, is a discouraging factor for voter participation. The Grange is concerned that reducing mail delivery from six days to five days could potentially impact a rural voter's attempts to (a) request, receive and return certified voter registration material by mail, (b) request and receive certified mail-in or absentee ballot materials by mail, and (c) casting their ballot by mail.

**RESPONSE OF PUBLIC REPRESENTATIVES' WITNESS LUTTRELL
TO UNITED STATES POSTAL SERVICE INTERROGATORY USPS/PR-T2-4**

USPS/PR-T2-4

Please refer to your testimony at page 7, lines 12-16. Separately for each specific postal service change at issue in this proceeding (see USPS-T-1), please explain how and by whom that change might be challenged as a violation of the provisions of the Voting Rights Act. In your response cite specific provisions of the Act and explain how each might be implicated.

RESPONSE:

The National Grange is concerned that elimination of local, rural Saturday mail delivery, mail processing, and mail pick-up by the United States Postal Service may have an adverse effect on all potential rural voters that seek to utilize vote-by-mail or absentee voting options whether or not those voters are covered by protected status under Federal statutes to assure full participation by minority, disabled, overseas U.S. citizens or deployed active military voters.

The National Grange does not have specific information or data that would specifically explain how and by whom the changes proposed in this docket might be challenged under the Voting Rights Act or other federal statutes that protect the voting rights of specific subsets of voters. This does not mitigate our general concern that challenges might arise.

**RESPONSE OF PUBLIC REPRESENTATIVES' WITNESS LUTTRELL
TO UNITED STATES POSTAL SERVICE INTERROGATORY USPS/PR-T2-5**

USPS/PR-T2-5

Please refer to PR-T-2 at page 6, line 19. Please identify all states that comprise the majority in which "private self-governing entities" are required to "conduct their business utilizing postal voting." For each state, please provide citation to the statute, ordinance and/or regulation requiring these entities to use the mail for such purposes, and indicate in each case whether postal voting is the exclusive method that must be used. In your response, clarify which organizations are referenced by use of the word "these" in line 20.

RESPONSE:

The National Grange does not have a list of the requested states or citations. However, I can confirm that many basic economic and infrastructure services in rural communities are commonly provided by independently chartered government entities or consumer-owned cooperatives. Examples of these self-governing entities include public utility districts/rural electric cooperatives, public telephone districts/rural telephone cooperatives, water districts/water sewage cooperatives, fire districts/volunteer fire cooperatives, irrigation districts and conservation districts.

These self-governing entities are a critical part of the rural economic infrastructure in many states. Many of the basic economic and infrastructure services provided by self-governing entities, whether public or cooperative, rely on mail ballot elections to elect their boards and conduct critical governance referenda.

Although not required to use the U.S. Postal Service for voter registration, ballot distribution and ballot collection services, in my experience traveling around the nation for the National Grange, nearly all of these self-governing entities use the mail service as their voting mechanism due to the logistical issues of having geographically dispersed service areas.