

Commissioners;

After reading the numerous interrogatories posed by the USPS to various witnesses that have expressed opposition to the objectives expressed in the RAO I am submitting these follow-up comments to my earlier submission in this docket.

The processes we use in proceedings like this one are by tradition and nature adversarial. While we give nod to the idea that these types of proceedings are at essence a search for the truth none of us are so naïve as to believe that participants in the process are more concerned about empirical truth than about winning the day for a particular point of view. The fact of the matter is that if we could arrive at perfect truths in matters of economics and politics that much of the disruption and contention we find in our quest to administrate society would miraculously disappear. None of us believes that is possible let alone a reasonable expectation.

Matters of economics and politics are certainly susceptible to arguments based on empirical measurement but in determining the best course we must also rely on judgment, experience, and the benefit of accumulated knowledge. We must also recognize that unlike in a scientific experiment where a hypothesis is proposed and we have accepted means of testing that hypothesis, i.e. accepted experimental protocols and universally accepted units and methods of measure, that in matters of economics and politics our laboratory is often society at large. In such a laboratory we are unable to maintain exact controls and often even our units of measure and the importance we place on their meaning are somewhat arbitrary.

In proceedings like this one it is customary in determining the validity of a particular piece of testimony that we rely on the credibility of the witness or the participant. We understand that in a proceeding like this, unlike a purely scientific experiment, that what is portrayed as empirically accurate is often not truly so but a reflection of one side or the other's final objective. We also find that as one side may challenge the other's credibility by attempting to undermine empirical substance that perhaps a fair final judgment ought to take into account the totality of a subject's testimony rather than dismiss it simply because it appears to lack empirical support. The lack of a study or number to support the opinion and conclusion of a witness with proven experience and judgment does not necessarily make the witness wrong.

I think that those who participate in adversarial proceedings like this one will agree that a common tactic used to undermine the credibility of a witness is to simply bury the witness with volume and then claim the witness is less than credible when she cannot respond with like volume. Such a tactic is less about a search for the truth than simply a matter of a party with deep pockets attempting to bully the opposition into submission, or as I think the legal term goes, paper her to death.

The United States Postal Service is a large monolithic, autocratic, and often opaque organization with tremendous resources. In more than a few proceedings before this Commission it has proffered its view as the only view and the tone and tenor of some of its submissions exceed the definition of arrogance. Its responses to and interrogatories of opposing participants often seem intended to dismiss and demean rather than articulate and illuminate. That is unfortunate.

Reading the interrogatories in the case currently before you I find a voluminous number that seem to have no purpose other than to attack and bury the witness. For example, I found Mayor Donald Hobbs' testimony a compelling and accurate view of small town America. His testimony clearly reflected an understanding of his local community. That should be respected not attacked and the fact that Mr. Hobbs has not done studies or spent his time in an academic deconstruction of the intangibles that make small town America what it is should in no way tarnish or diminish the testimony of a man who clearly and passionately understands the dynamics of his community and communities like his. In fact, the tactics the Postal Service utilizes, whether to discredit Mayor Hobbs or cavalierly breeze through a community meeting, are indicative of their lack of understanding of their obligations under the law, or perhaps their fear of testimony from someone who clearly does. Since it is clear that they don't understand the meaning or value of universal service and its importance for rural areas, is it a wonder they so blithely dismiss it?

I have worked for the United States Postal Service for nearly twenty-eight years and they, as an institution, are bullies. The prevailing cultural and institutional mentality of the organization is geared towards silencing any opinion that conflicts even slightly with the edicts of the L'Enfant Plaza echo chamber. The response to both customers and employees who question the organization's prerogatives is dismissal and compulsion and many of the interrogatories directed at opposition witnesses in this case reflect that mindset.

I have neither studies nor data to sustain that observation, only years of experience and anecdotes, some of which I have shared in earlier submissions before this body, along with the anecdotes of thousands of employees and customers. In this case and in many of the specific closure appeals cases before you it becomes appallingly evident that Postal Service has treated its obligations to inform and include the public as a distraction. The Postal Service regularly manipulates data and practices to yield preferential results; I've previously written about practices that distort EXFC or the manner which VOE surveys are handled.

Gaming data is a fine art at the Postal Service, and in a way it is not surprising that they only feel comfortable in an environment which they are the experts at gaming.

When one looks at the strategic pronouncements of the senior management of the USPS over the last ten or fifteen years one sees a vision that is often contradictory and sometimes incoherent but almost uniformly disposed towards moving the organization in the direction of privatization. Former PMG Jack Potter's Transformation strategy was based on building a 21st Century mailing company, relying on increasing volumes. The burdens of the PAEA and the recession obviously made that strategy inoperable but the fact is that there has continuously been talk about reducing the network and moving more towards a privately oriented retail network.

I'm not in a position to ask interrogatories in this case but if I was I might ask the Postal Service if it had ever considered plans that would enhance and strengthen the value of the network by adding services that were in line with providing robust universal service. Has the USPS considered developing a secure electronic mailbox service for those with no or limited internet access? Has the USPS devoted any resources towards developing an electronic bill presentment and payment system? The USPS has actively

explored changes in Federal regulations that would redefine post offices or reduce its burdens under the law, has it also examined and investigated changes in those regulations that would allow it closer coordination with federal, state, and local governments? Or changes that would allow it to strengthen the viability of the network while providing more robust and cost effective universal service? The PRC has engaged at least one study in examining the social value of the post and the value of the presence of the post in communities throughout the nation; has the Postal Service conducted similar studies? The Postal Service has indicated that one of its objectives in effecting small office closures is a reduction in costs; has the Postal Service conducted studies, audits and other activities of internal management practices and directives? How has the Postal Service responded to anecdotal reports of driving empty mail tubs around or driving fewer than ten letters out as a means of sustaining EXFC scores? Does the Postal Service consider practices like these to be consistent with a mentality of cost savings

In my earlier comments to you in this case I suggested that as you consider this case you consider it in light of first principles. Our nation stands at a crossroads, will we support and sustain our infrastructure, will we preserve and build infrastructure on which we can base a healthy, growing, inclusive economy? Or, will we, like a snake eating its own tail feel temporarily sated by immediate gratification while devouring ourselves and our future? There have been many witnesses in this case, honorable people with experience and judgment, who have talked about the importance and value of a strong post and how the designs of the Postal Service will undermine that. Do not dismiss their knowledge and wisdom under a flurry of faux empiricism designed to obfuscate rather than clarify.

Mark Jamison
1363 Webster Rd
Sylva, NC 28779
828-582-0165
Mij455@gmail.com