POSTAL REGULATORY COMMISSION

Report on Rate Increases for Market Dominant Products

Report to the House Committee on Appropriations

December 9, 2022

TABLE OF CONTENTS

Page

EXECUTIVE SUMMARY

As part of the Consolidated Appropriations Act, 2022 making appropriations to the Commission for its FY 2022 budget, the House Committee on Appropriations (the Committee) stated that it is "concerned with the size and timing of the [Postal Service's August 2021] rate increase [for Market Dominant products] and that the [Postal Accountability and Enhancement Act of 2006 (PAEA)] process did not account for the impact of the pandemic, including factors such as higher package revenues and emergency funding provided to the [Postal Service]."[1] The Joint Explanatory Statement accompanying the Appropriations Act directs the Commission to consult with stakeholders for its report on Market Dominant products.[2]

The Commission prepared this Report on rate increases for Market Dominant products to the Committee.

A. 10-Year Review of the Initial Market Dominant Ratemaking System and the Adoption of the Modified Ratemaking System

The PAEA required the Commission to establish an initial ratemaking system for Market Dominant products after the PAEA's enactment, which must include a price cap limiting rate increases to annual changes in the consumer price index for all urban consumers (CPI-U).[3] The Commission established such an initial ratemaking system through regulations in 2007. The PAEA also required the Commission to review the initial ratemaking system 10 years after the PAEA's enactment to determine if it had achieved 9 statutory objectives, taking into account 14 statutory factors.[4]

During a lengthy rulemaking process from 2016 to 2020, the Commission conducted such a 10-year review. It found that the initial ratemaking system did not achieve the statutory objectives, taking into account the statutory factors. It found that the Postal Service's operating environment changed dramatically after the PAEA's enactment due to the Great Recession and technological trends, the Postal Service's costs increased significantly due to

[1] H.R. Rep. No. 117-79, at 100 (2021).

[2] 168 Cong. Rec. H1709 (daily ed. Mar. 9, 2022) (explanatory statement submitted by Rep. Rosa L. DeLauro, Chair of the House Committee on Appropriations, regarding the House amendment to the Senate amendment to H.R. 2471, Consolidated Appropriations Act, 2022) (Joint Explanatory Statement).

[3] Postal Accountability and Enhancement Act (PAEA), Pub. L. 109-435, § 201, 120 Stat. 3198, 3202 (2006). 39 U.S.C. § 3622(d)(1)(A).

[4] PAEA § 201; 39 U.S.C. § 3622(d)(3).

the PAEA's requirement that the Postal Service prefund future retiree health benefits (RHBs), and the Postal Service was unable to raise rates sufficiently given the CPI-U price cap. As a result, the Postal Service failed to achieve medium-and long-term financial stability and was unable to achieve retained earnings (Objective 5). In addition, the initial ratemaking system failed to maximize pricing and operational efficiency (Objective 1), failed to maintain reasonable rates (Objective 8), and failed to maintain high quality service standards (Objective 3).

Therefore, the Commission adopted final rules establishing a modified ratemaking system in November 2020. In the final rules, the Commission provided the Postal Service two additional forms of rate authority besides the CPI-U rate authority to address two drivers of the Postal Service's net losses outside of its direct control: (1) density rate authority to address the increase in per-unit cost resulting from declines in mail density, and (2) retirement rate authority to address the statutorily mandated amortization payments for retirement costs. In addition, the Commission also provided the Postal Service with an additional 2 percent rate authority for each non-compensatory class of mail[5] and defined rate-setting criteria for non-compensatory products in compensatory classes.[6] Furthermore, the Commission adopted a number of other modifications to the ratemaking system, such as limitations on setting workshare discounts, cost-reduction reporting requirements, and procedural improvements. Together, these modifications were designed to remedy the deficiencies of the initial ratemaking system and achieve all of the statutory objectives under the PAEA on balance. Finally, the Commission committed to review the modified ratemaking system in 5 years, and to review specific components of the system sooner than 5 years if necessary.

In its order adopting the final rules for the modified ratemaking system, the Commission considered and denied several commenters' motions to reopen the record to examine the impact of the COVID-19 pandemic on the Postal Service and the proposed rules for the modified ratemaking system. The Commission determined that nothing specific to the pandemic undermined its findings that the initial ratemaking system failed to achieve the statutory objectives and that the Postal Service remained financially unstable.

The Commission rejected the commenters' argument that the density rate authority is flawed because the volume shift from Market Dominant products to packages during the pandemic meant the higher revenue realized from packages offset the revenue lost from Market Dominant products. The Commission reasoned that the density rate authority is designed to address the increase in per-unit costs caused by declines in volume per delivery point, regardless of the revenue associated with packages versus Market Dominant products. In addition, the Commission uses the volume input that experiences

[5] A non-compensatory class refers to a class of mail for which the costs of all products within that class exceed the revenues of all products within that class. 39 C.F.R. §§ 3030.220, 3030.222.

[6] A non-compensatory product in a compensatory class refers to a product for which the cost of that particular product exceeds the revenue from that product and the product is classified within a class where the overall class revenues exceed the costs for that class. 39 C.F.R. §§ 3030.220, 3030.221.

the lesser decline (either Market Dominant products or total volume) in the density rate authority formula, which properly accounts for the role of Competitive products and benefits Market Dominant ratepayers.

The Commission also rejected the commenters' argument that the additional $10 billion borrowing authority made available by the Coronavirus Aid, Relief, and Economic Security Act (CARES Act) to the Postal Service undermined the Commission's findings on the Postal Service's liquidity. The Commission found the additional borrowing authority was limited to addressing the Postal Service's short-term operating needs due to the pandemic and could not be used to address its longer-term financial stability. The Commission stated that it is the net losses and accumulated deficits that undermine the Postal Service's longer term financial stability that the density rate authority, retirement rate authority, and non-compensatory class/product modifications are designed to address, and the additional borrowing authority does not impact the Commission's analysis.

B. Judicial Affirmance of the Modified Ratemaking System

Following the publication of the final rules in the *Federal Register*, multiple mailers and the Postal Service petitioned the U.S. Court of Appeals for the District of Columbia Circuit (D.C. Circuit) for review of the modified ratemaking system. In November 2021, the D.C. Circuit affirmed all aspects of the system, and on June 27, 2022, the Supreme Court of the United States denied certiorari.

The D.C. Circuit found that the PAEA, by its plain terms, authorizes the Commission to replace the initial ratemaking system altogether, including its requirement of the CPI-U price cap, and allows the Commission to adopt an alternative system with rate authorities in excess of the CPI-U price cap.

In addition, guided by the deferential standard of review as the case involved the Commission's reasoned judgments about technical questions within its area of expertise, the court found that the Commission articulated a rational connection between the statutory objectives and the decision it made. In particular, the court found that the Commission reasonably rejected the mailers' arguments against the density rate authority and justified it on the basis that it is designed to offset increases in per-unit costs caused by declining mail density, not to offset contribution or revenue changes from individual mail classes. Furthermore, the court found that the Commission reasonably supported its decision not to reopen the record to consider the impact of the pandemic and the volume shift from Market Dominant products to packages, because the Commission explained that nothing specific to the pandemic altered its findings that the initial ratemaking system failed to achieve the statutory objectives and the Postal Service remained financially unstable. Finally, the court noted with approval that the Commission is committed to intervening as necessary if economic conditions prevent the final rules from operating as intended to achieve the statutory objectives.

C. Size and Timing of the August 2021 Rate Increase

After the modified ratemaking system took effect in January 2021, the Postal Service has increased rates for Market Dominant products, effective in August 2021 and July 2022, and will increase rates effective in January 2023, all of which were approved by the Commission.

Table 1
Available Rate Adjustment Authority (By Ratemaking Authority) in Docket Nos. R2021-2, R2022-1, and R2023-1

Ratemaking Authority	Docket No. R2021-2[a]	Docket No. R2022-1[b]	Docket No. R2023-1[c]	Total by Rate Authority Source
CPI-U	1.244%	5.135%	4.200%	10.579%
Density	4.500%	0.583%	0.000%	5.083%
Retirement	1.062%	0.785%	0.000%	1.847%
Subtotal for Compensatory Classes[d]	**6.806%**	**6.503%**	**4.200%**	**17.509%**
Non-Compensatory[e]	2.000%	2.000%	0.000%	4.000%
Total[f]	**8.806%**	**8.503%**	**4.200%**	**21.509%**

[a] Docket No. R2021-2, Order on Price Adjustments for First-Class Mail, USPS Marketing Mail, Periodicals, Package Services, and Special Services Products and Related Mail Classification Changes, July 19, 2021, at 4, Table II-1 (Order No. 5937).
[b] Docket No. R2022-1, Order on Price Adjustments for First-Class Mail, USPS Marketing Mail, Periodicals, Package Services, and Special Services Products and Related Mail Classification Changes, May 27, 2022, at 4, Table II-1 (Order No. 6188).
[c] Docket No. R2023-1, Order on Price Adjustments for First-Class Mail, USPS Marketing Mail, Periodicals, Package Services, and Special Services Products and Related Mail Classification Changes, November 28, 2022, at 5, Table II-1 (Order No. 6341).
[d] The subtotal for compensatory classes includes CPI-U, density, and retirement rate authorities, which are available to all compensatory classes. Compensatory classes include First-Class Mail, USPS Marketing Mail, and Special Services. They account for the vast majority of the Postal Service's volume and revenue. Order No. 5937 at 4, Table II-1; Order No. 6188 at 4, Table II-1; Order No. 6341 at 5, Table II-1.
[e] The 2 percent non-compensatory rate authority is only available for non-compensatory mail classes per fiscal year, not all mail classes. No-compensatory classes include Periodicals and Package Services, which account for only a small amount of the Postal Service's volume and revenue. Order No. 5937 at 4, Table II-1; Order No. 6188 at 4, Table II-1; Order No. 6341 at 5, Table II-1.
[f] This does not include banked, or unused, rate authority.

In the August 2021 rate increase, most of the increase was based on density rate authority. Density rate authority is designed to address the increase in per-unit costs caused by declines in mail volume per delivery point. This is precisely what happened during the pandemic—the mail volume declined significantly and the number of delivery points increased in 2020.[7] The ability of the density rate authority formula to respond to unanticipated changes in mail density is one of the reasons the Commission opted for a targeted formula instead of its originally proposed flat 2 percent supplemental rate authority. The large decline in mail density observed in 2020 was just such a change, and the density rate authority formula responded appropriately by increasing the amount of the rate authority.

After the August 2021 rate increase, the pandemic's impact on mail volume declines stabilized; this led to far less density rate authority being available to the Postal Service for use in subsequent rate increases.[8] Indeed, most of the July 2022 and January 2023 rate increases were based on CPI-U rate authority. This reflects the surging inflation experienced by the United States in 2021 and 2022. For example, the CPI-U increased by 9.1 percent from June 2021 to June 2022. Significantly, the CPI-U rate authority would have been granted under the initial ratemaking system as well.

With regard to the timing of the August 2021 rate increase, the Commission has explained that the new requirement under the modified ratemaking system that the Postal Service file a schedule of rate adjustments with the Commission at the time of filing its 39 U.S.C. § 3652 report was not in effect when it filed its section 3652 report in December 2020, because the modified ratemaking system did not go into effect until January 2021. Therefore, the timing of the August 2021 rate increase was consistent with the then-existing law.

In September 2021, the Postal Service filed an updated schedule for rate adjustments with the Commission. The Postal Service stated that it would forgo rate adjustment in January 2022, and it would adjust rates twice annually in January and July, starting with the July 2022 rate adjustment. Therefore, since July 2022, the Postal Service has established a schedule of rate adjustments that is regular, planned, and predictable.

In sum, the size and timing of the August 2021 rate increase were consistent with all applicable laws and demonstrated that the modified ratemaking system was working as intended to address discrete drivers of the Postal Service's net losses that are out of its direct control.

---

[7] *See* Docket No. ACR2020, Determination of Available Market Dominant Rate Authority, April 6, 2021, at 3 (Order No. 5861) (finding that Market Dominant volume decreased from 136,898 million in FY 2019 to 122,054 million in FY 2020, total volume decreased from 142,570 million in FY 2019 to 129,184 million in FY 2020, and delivery points increased from 139.96 million in FY 2019 to 141.39 million in FY 2020).

[8] *See* Docket No. ACR2021, Determination of Available Market Dominant Rate Authority, March 29, 2022, at 4 (Order No. 6130) (finding that Market Dominant volume decreased from 122,054 million in FY 2020 to 121,640 million in FY 2021, total volume decreased from 129,184 million in FY 2020 to 128,895 million in FY 2021, and delivery points increased from 141.39 million in FY 2020 to 143.11 million in FY 2021).

D. The Impact of the COVID-19 Pandemic

As discussed above, the Commission addressed the impact of the pandemic in its final rules adopting the modified ratemaking system, and the D.C. Circuit affirmed its decision.

In the final rules, the Commission determined that nothing specific to the pandemic undermined its findings that the initial ratemaking system failed to achieve statutory objectives and that the Postal Service was financially unstable. The Commission explained that the density rate authority is designed to address the increase in per-unit costs caused by declines in volume per delivery point, and revenue-per-piece has no relation to this. In addition, the Commission noted that it uses the volume input that experiences the lesser decline (either Market Dominant products or total volume) in the density rate authority formula. When Competitive products experience more favorable changes in volume than Market Dominant products (as it happened during the pandemic), this design benefits Market Dominant ratepayers. This design also protects Market Dominant ratepayers from increased density rate authority when Competitive products experience less-favorable changes in volume.

With regard to the additional $10 billion borrowing authority made available by the CARES Act to the Postal Service, the Commission found that the additional borrowing authority was limited to addressing the Postal Service’s short-term operating needs due to the pandemic and could not be used to address its longer-term financial stability, which is what the additional rate authorities are designed to address.

The D.C. Circuit affirmed the Commission’s final rules and its analyses in all aspects.

In its order approving the August 2021 rate increase, the Commission updated its analysis on the impact of the pandemic and continued to find that pandemic-related factors did not alter its findings in the 10-year review that the initial ratemaking system failed to achieve the statutory objectives and the modified system is necessary to put the Postal Service on a sustainable path to financial stability.

E. Stakeholder Input

The Commission considered stakeholders’ input on the issues discussed in this Report. The Commission received more than 400 submissions. After reviewing the submissions, the Commission finds that the vast majority of stakeholders do not provide input on the size and timing of the August 2021 rate increase or the impact of pandemic-related factors on the rate increases for Market Dominant products, which is the Committee’s focus for this Report. A few stakeholders raise similar arguments that commenters in the 10-year review made regarding the impact of the pandemic, which the Commission already addressed in the order adopting the modified ratemaking system. On appeal, the D.C. Circuit also considered these arguments and affirmed the Commission’s determinations relating to the pandemic in adopting the modified ratemaking system.

CHAPTER I. INTRODUCTION

On March 15, 2022, President Joseph R. Biden Jr. signed H.R. 2471, the "Consolidated Appropriations Act, 2022" (the Appropriations Act or the Act), making consolidated appropriations for the fiscal year ending September 30, 2022.[9] Division E of the Act includes an appropriation of $17,510,000 from the Postal Service Fund for necessary expenses of the Commission in carrying out the provisions of the PAEA.[10]

As adopted by the Joint Explanatory Statement accompanying the Appropriations Act,[11] House Report 117-79 states:

> *Rate Increases for Market-Dominant Products.*—The Postal Accountability and Enhancement Act of 2006 (PAEA) required the PRC to review the existing Market Dominant rate and classification system 10 years after the enactment of the PAEA. Based on this review, the PRC adopted rules in November 2020 providing greater pricing flexibility to the United States Postal Service (USPS). USPS has used this expanded authority to propose increasing certain postal rates effective August 20, 2021, by approximately 7 percent. The Committee is concerned with the size and timing of the rate increase and that the PAEA process did not account for the impact of the pandemic, including factors such as higher package revenues and emergency funding provided to the USPS. The PRC is directed to study these factors and report to the Committee within 270 days on how these factors should impact the rate increases proposed by the USPS and the PRC rules adopted in November.

H.R. Rep. No. 117-79, at 100.

The Joint Explanatory Statement directs the Commission to consult with stakeholders for its report on Market Dominant products. 168 Cong. Rec. at H2356.

Because the Appropriations Act was enacted on March 15, 2022, the Commission's report to the Committee on rate increases for Market Dominant products is due 270 days from that date, *i.e.*, December 10, 2022. Accordingly, the Commission transmits this Report to the Committee on December 9, 2022.

---

[9] Upon enactment, H.R. 2471 became Consolidated Appropriations Act, 2022, Pub. L. No. 117-103, 136 Stat. 49.

[10] Consolidated Appropriations Act, 2022, div. E, tit. V, Postal Regulatory Commission.

[11] 168 Cong. Rec. H1709. The Joint Explanatory Statement adopts House Report 117-79 as an express indication of congressional intent that "carries the same weight as language included [therein] and should be complied with unless specifically addressed to the contrary [therein]." *See* 168 Cong. Rec. at H2349.

CHAPTER II. 10-YEAR REVIEW OF MARKET DOMINANT RATEMAKING SYSTEM

A. Introduction

In 2006, Congress enacted the PAEA. *See* PAEA. The PAEA required the Commission to promulgate regulations establishing a ratemaking system for Market Dominant products within 18 months after the law's enactment.[12] The PAEA mandated certain features that the ratemaking system in its initial form had to include, most prominently a price cap limiting rate increases to annual changes in the consumer price index for all urban consumers (CPI-U). *See* 39 U.S.C. § 3622(d)(1)(A). The PAEA also required the Commission to review the ratemaking system 10 years after the PAEA's enactment to determine if it had achieved 9 statutory objectives specified by the PAEA, taking into account 14 statutory factors. 39 U.S.C. § 3622(b), (c), and (d)(3). If the Commission determined that the ratemaking system had not achieved the statutory objectives, taking into account the statutory factors, then "the Commission may, by regulation, make such modification or adopt such alternative system…as necessary to achieve the objectives." 39 U.S.C. § 3622(d)(3).

On December 20, 2016, the Commission initiated its required review of the ratemaking system by issuing an advance notice of proposed rulemaking.[13] After receiving and considering public comments, the Commission issued its findings on December 1, 2017.[14] The Commission found that the ratemaking system was not achieving the statutory objectives, taking into account the statutory factors. Order No. 4257 at 275. The Commission therefore set about the task of "mak[ing] such modification or adopt[ing] such alternative system…as necessary to achieve the objectives." 39 U.S.C. § 3622(d)(3).

On the same day that it released its findings, the Commission issued a notice of proposed rulemaking (NPR) proposing a number of regulatory modifications to the ratemaking system intended to enable the system to achieve the statutory objectives.[15] The NPR sought public comment on the Commission's proposals, and the Commission received a wide

---

[12] 39 U.S.C. § 3622(a) instructs the Commission to establish "a modern system for regulating rates and classes for market-dominant products." This system for regulating rates and classes for Market Dominant products is collectively referred to as the "ratemaking system." The Commission promulgated regulations establishing the ratemaking system in 2007. *See* Docket No. RM2007-1, Order Establishing Ratemaking Regulations for Market Dominant and Competitive Products, October 29, 2007 (Order No. 43).

[13] Docket No. RM2017-3, Advance Notice of Proposed Rulemaking on the Statutory Review of the System for Regulating Rates and Classes for Market Dominant Products, December 20, 2016 (Order No. 3673).

[14] Docket No. RM2017-3, Order on the Findings and Determination of the 39 U.S.C. § 3622 Review, December 1, 2017 (Order No. 4257).

[15] Docket No. RM2017-3, Notice of Proposed Rulemaking for the System for Regulating Rates and Classes for Market Dominant Products, December 1, 2017 (Order No. 4258).

range of comments in response. Based on the comments received, the Commission issued a revised notice of proposed rulemaking on December 5, 2019, again seeking public comment on the Commission's revised proposals.[16] The Commission once again received a wide range of comments. After considering these comments, the Commission issued an order adopting final rules for the modified ratemaking system for Market Dominant products on November 30, 2020.[17] The modified ratemaking system took effect on January 14, 2021.[18]

B. The Need for Modifications to the Initial Ratemaking System

In Order No. 4257, the Commission identified specific aspects of the initial ratemaking system that had failed to achieve the PAEA's statutory objectives, taking into account the statutory factors.

Prior to the enactment of the PAEA, the Postal Service operated under a cost-of-service ratemaking system with a break-even mandate, in which it was expected to generate sufficient revenue to cover its operating costs, but not retained earnings. Order No. 4257 at 24. The PAEA reformed postal ratemaking by ending the break-even mandate and encouraging the Postal Service to generate retained earnings. *Id.* at 31. It replaced the cost-of-service model for postal ratemaking with a price cap model in which rate increases were limited to annual changes in CPI-U. *Id.* at 32.

At the time the PAEA was enacted, overall mail volume was increasing and the Postal Service's financial position appeared to be stable.[19] Moreover, prior to the enactment of the PAEA, increases in Postal Service costs tended to track increases in the consumer price index (CPI). Order No. 4257 at 37. However, the PAEA also established a significant new obligation for the Postal Service. It required the Postal Service to prefund future RHBs, with the goal of reducing the Postal Service's future RHB liability by FY 2017. *Id.* (citing PAEA § 803). These payments were to average $5.6 billion per year.[20]

During the 10-year review mandated by the PAEA, the Commission found that the Postal Service's operating environment changed rapidly after the PAEA was enacted. Order No. 4257 at 35. The Great Recession, which began in 2007, had a substantial negative impact on

[16] Docket No. RM2017-3, Revised Notice of Proposed Rulemaking, December 5, 2019 (Order No. 5337).

[17] Docket No. RM2017-3, Order Adopting Final Rules for the System of Regulating Rates and Classes for Market Dominant Products, November 30, 2020 (Order No. 5763).

[18] Order No. 5763 at 370 (stating that the revised rules are to take effect 30 days after publication in the *Federal Register);* System for Regulating Market Dominant Rates and Classifications, 85 Fed. Reg. 81,124 (Dec. 15, 2020).

[19] Order No. 4257 at 37. Market Dominant mail volume reached its peak in FY 2006—the year the PAEA was enacted. *See* Docket No. RM2017-3, Library Reference PRC-LR-RM2017-3/1, December 1, 2017, Excel file "PRC-LR-RM2017-3-1.xlsx," tab "Figure II-23," column F (displaying Market Dominant volume from FY 1997 through FY 2016).

[20] Order No. 4257 at 37 (citing PAEA § 803; 5 U.S.C. § 8909a(d)(3)(A)).

Postal Service volume and revenues. *Id.* at 38. This economic downturn occurred in concert with emergent technological trends (*e.g.*, email, text messaging, and other electronic transmission of messages and information) that resulted in even greater volume declines for First-Class Mail, in particular—the Postal Service's most profitable mail class.[21] Moreover, in the aftermath of the Great Recession there was a period of deflation, which constrained the Postal Service's ability to raise rates given the CPI-based price cap.[22] At the same time, the Postal Service's total costs increased dramatically largely due to recognition of the RHB prefunding cost as an expense. *Id.* at 39-40. The result was that after the enactment of the PAEA the Postal Service's total costs began exceeding its total revenues. *Id.* at 40.

The divergence between the Postal Service's costs and revenues made it difficult for the Postal Service to accumulate retained earnings through sustained net income. The required RHB prefunding costs, increases in non-cash workers' compensation expenses,[23] significant reductions in mail volume and revenue related to internet diversion, and the extensive business downturn and slow economic recovery following the Great Recession contributed to the Postal Service's inability to generate net income. *Id.* at 40-41. The Postal Service ultimately defaulted on the majority of the required annual RHB prefunding costs. Order No. 5337 at 82. Over the 10 years immediately preceding the enactment of the PAEA, the Postal Service reported a cumulative net income of $11.3 billion. *See* Order No. 4257 at 30, Figure II-1. However, over the 10 years after the PAEA was enacted, the Postal Service suffered a cumulative net loss of $59.1 billion. *Id.* at 171.

For purposes of organization, the Commission's analysis in Order No. 4257 grouped the PAEA's nine statutory objectives into three principal areas: (1) the structure of the ratemaking system; (2) the financial health of the Postal Service; and (3) service. *Id.* at 22. Each principal area was further divided into subtopics addressing relevant objectives and factors. *Id.* Applying this framework to analyze the PAEA's 9 statutory objectives and taking into account the 14 statutory factors, the Commission found that while the initial ratemaking system had fulfilled some of the PAEA's goals, the overall system had not achieved the statutory objectives. *See id.* at 4-5. For the first principal area—the structure of the ratemaking system—the Commission found that the initial ratemaking system failed to increase pricing efficiency (Objective 1), because the workshare discounts set during the PAEA era had not been set as close as practicable to their avoided costs and multiple products had failed to cover their attributable costs. *See id.* at 135-45. For the second principal area—the financial health of the Postal Service—the Commission found that the

[21] *Id. See* United States Government Accountability Office, Report No. GAO-20-385, U.S. Postal Service: Congressional Action is Essential to Enable a Sustainable Business Model, May 2020, at 8-9, available at *https://www.gao.gov/assets/710/706729.pdf*.

[22] Order No. 4257 at 38 (citing United States Department of Labor, U.S. Bureau of Labor Statistics, One Hundred Years of Price Change: The Consumer Price Index and the American Inflation Experience, April 2014, available at *https://www.bls.gov/opub/mlr/2014/article/one-hundred-years-of-price-change-the-consumer-price-index-and-the-american-inflation-experience.htm*).

[23] The non-cash workers' compensation expense includes actuarial revaluations of existing cases and new cases, initial costs of new cases for the year, and any changes in the discount rate used to estimate the amount of current funds needed to settle all claims in the current year. This is separate from the cash payment which is made to the U.S. Department of Labor for the current year's cost of medical and compensation benefits and an administrative fee.

initial ratemaking system failed to allow the Postal Service to achieve medium- and long-term financial stability (Objective 5). *See id.* at 165-71. This failure was evidenced by total revenue being inadequate to cover total costs, resulting in the Postal Service suffering a net loss every year during the PAEA era. *Id.* at 165-69. This accumulation of net losses resulted in accumulated deficits, which prevented the Postal Service from being able to achieve retained earnings. *Id.* at 169-71. Additionally, the Commission determined that the Postal Service had not had any working capital (assets in excess of liabilities) during the PAEA era, its capital expenditure ratio had declined, and its debt ratio had steadily increased. *Id.* at 172-75. Ultimately, the Commission concluded that while the Postal Service had been able to reduce costs and increase operational efficiency during the PAEA era, the results had been insufficient to achieve overall financial stability, and thus the incentives to reduce costs and increase operational efficiency had not been maximized as intended by the PAEA (Objective 1). *Id.* at 221-26. The Commission also found that there had not been an adequate mechanism under the ratemaking system to maintain reasonable rates (Objective 8) because the rates for certain products and mail classes had been insufficient to cover their attributable costs. *Id.* at 226-36. The Commission attributed this, at least in part, to the CPI-U price cap limitation. *Id.* at 236. Finally, for the third principal area—service (Objective 3)—the Commission found that service standards declined during the PAEA era because the Postal Service had reduced the high-quality service standards that were initially promulgated in 2007. *See id.* at 273.

Taken together, the Commission concluded that while some aspects of the initial ratemaking system had worked as planned, the overall system had not achieved the objectives of the PAEA. *Id.* at 5. This was largely due to the fact that "the operating environment on which the PAEA was designed changed quickly and dramatically after the PAEA was passed[ ]," and "this made it challenging for the ratemaking system under [the] PAEA to achieve the goals it was designed to achieve." *Id.* at 45. As a result, "although the...CPI-based price cap system was anticipated, at the time of its implementation, to enable the Postal Service to produce sustained net income and generate retained earnings, that has not occurred." *Id.* at 148.

Therefore, the Commission set about the task of "mak[ing] such modification or adopt[ing] such alternative system…as necessary to achieve the objectives." 39 U.S.C. § 3622(d)(3).

C. The Modified Ratemaking System Adopted in Order No. 5763

As discussed above, after receiving and considering multiple rounds of public comments, the Commission ultimately adopted final rules for a modified ratemaking system in Order No. 5763 on November 30, 2020. In addition to the CPI-U rate authority, the Commission made two additional forms of rate authority available to the Postal Service to address two underlying drivers of the Postal Service's net losses largely outside of its direct and near-term control. These were: (1) density rate authority to address the increase in per-unit cost resulting from declines in mail density and (2) retirement rate authority to address the statutorily mandated amortization payments for retirement costs.[24]

To calculate the density rate authority, the Commission developed a dynamic formula-based approach, targeted to respond to exogenous increases in per-unit cost due to declines in the average volume of mail per delivery point. Order No. 5763 at 17, 27. The Commission designed the formula to conservatively approximate the amount by which average cost per piece is expected to *unavoidably* increase in the near term as a result of the decline in density as remaining costs are distributed over fewer pieces, thereby reigning in the magnitude of potential rate increases. *Id.* at 316 (emphasis in original). The formula was limited to adjust for declines calculated after the modified ratemaking system took effect (based upon the observed density decline experienced in the most recently ended fiscal year) and to not adjust for prior declines. *Id.* at 304. The Commission also designed the formula to be based on transparent inputs that would be publicly knowable on a predictable basis and to contain mechanisms that would tend to limit annual fluctuations. *See id.* at 316-17. Further, the Commission designed the density rate authority formula to properly account for the role of Competitive products such that healthy Competitive product volume would translate to a direct benefit to Market Dominant ratepayers. *Id.* at 344-45.

To calculate the retirement obligation rate authority, the Commission developed a dynamic formula-based approach designed to limit the amount of additional rate authority to approximate the amount of specifically identified exogenous costs required by the PAEA and calculated by the U.S. Office of Personnel Management, and to phase in that increase to the rate base over 5 years. *Id.* at 318, 328. The Commission also designed the formula to be based on transparent inputs that would be publicly knowable on a predictable basis and to contain mechanisms that would tend to limit annual fluctuations. *See id.* at 317-18. The Commission required that all revenue collected be remitted towards the Postal Service's retirement liabilities to improve the Postal Service's ability to achieve net income by making payments towards its outstanding liability. *Id.* at 329.

By addressing the two substantial and uncontrollable drivers of the Postal Service's financial distress through the density rate authority and retirement rate authority, the modified ratemaking system would "permit the Postal Service to improve its financial stability (Objective 5) and maintain existing service standards (Objective 3), without reducing the Postal Service's incentives to reduce costs and increase efficiency (Objective 1)." *Id.* at 23.

To incrementally address long-standing problems concerning non-compensatory classes and products, the Commission also provided the Postal Service with an additional 2 percentage points of rate authority per fiscal year for each non-compensatory class of

[24] Order No. 5763 at 17-18, 21. *See* 39 C.F.R. §§ 3030.140-3030.143 (rules on CPI-U rate authority), §§ 3030.160-3030.162 (rules on density rate authority), §§ 3030.180-3030.185 (rules on retirement obligation rate authority).

mail[25] and defined rate-setting criteria for non-compensatory products in compensatory classes.[26] Order No. 5763 at 285. These rules for non-compensatory classes and products were designed to "increase allocative pricing efficiency (Objective 1), address inefficient pricing practices that undermine the Postal Service's financial health (Objective 5), and rebalance rates to be just and reasonable to both mailers and to the Postal Service (Objective 8)." *Id.* at 23.

In addition to these modified rate authorities, Order No. 5763 also adopted a number of other modifications to the ratemaking system, such as workshare discounts, cost-reduction reporting requirements, and procedural improvements. *See id.* at 22. The workshare discount rules were designed to address inefficient pricing practices to make them better conform to the principles of Efficient Component Pricing (Objective 1). *Id.* at 24. The cost-reduction reporting requirements were designed to "incentivize the Postal Service to improve the robustness of its cost-benefit analyses (Objective 1) in order to facilitate financially sound decision-making (Objective 5)[,]…without imposing an undue administrative burden on the Postal Service (Objective 6)." *Id.* The revisions to the Commission's procedural rules were designed to address "the competing priorities of increasing transparency and reducing administrative burden (Objective 6)." *Id.*

Together, all these modifications were "designed to remedy the deficiencies in the existing ratemaking system identified in Order No. 4257" and were "intended to balance the PAEA's statutory objectives in order to place the Postal Service on a sustainable financial path for the future." *Id.* at 24.

Finally, the Commission committed to review the system in 5 years, subject to its discretion to consider aspects of the system sooner (if needed), to balance the competing priorities of setting a review period that would be both short enough to safeguard against any potential unintended consequences and long enough to allow the effects of the changes to be observed. *Id.* at 31, 267.

D. Impact of the COVID-19 Pandemic

Several commenters in Docket No. RM2017-3 sought to reopen the record to examine the impact of the COVID-19 pandemic on the Postal Service and the mailing industry, which in their opinion would necessitate reconsideration of the Commission's proposed rules. *Id.* at 25. In particular, they took issue with the density rate authority because of the shift in the mail mix due to the volume decline in Market Dominant products and the increase in the volume of Competitive products the Postal Service experienced during the pandemic. *Id.* They also argued that the additional $10 billion borrowing authority that Congress made

[25] A non-compensatory class refers to a class of mail for which the costs of all products exceed the revenues of all products. 39 C.F.R. § 3030.222; Order No. 5763 at 189.

[26] A non-compensatory product in a compensatory class refers to a product for which the cost of that particular product exceeds the revenue from that product and the product is classified within a class where the overall class revenues exceed the costs for that class. 39 C.F.R. § 3030.221; Order No. 5763 at 181.

available to the Postal Service in the CARES Act[27] is relevant to the Commission's consideration of the Postal Service's liquidity. Order No. 5763 at 25.

After considering these comments and the effects of the COVID-19 pandemic, the Commission denied the commenters' motions to supplement the record. *Id.* at 31. The Commission determined that "nothing specific to the pandemic undermine[d] the findings the Commission made in Order No. 4257." *Id.* at 26. The Commission found that approximately 1 year into the pandemic at the time Order No. 5763 was issued, all the failings it identified with the then-existing ratemaking system in Order No. 4257 remained applicable:

> The Postal Service's finances remain unstable. Its liabilities far exceed its assets, and its liquidity has been maintained only by defaulting on statutorily mandated payments. Its working capital has declined even further since Order No. 4257 was issued. [Order No. 4257] at 29. The Postal Service's debt ratio has increased, and it still has very limited capacity for capital expenditure. *Id.* at 31-34. In addition, the problems identified in Order No. 4257 with respect to pricing and operational efficiency and unreasonable rates have not abated. These challenges, which all pre-date the pandemic, are expected to persist as long as the existing ratemaking system remains in effect, and nothing specific to the pandemic alters the Commission's findings with regard to these deficiencies.

Id. at 26-27 (footnotes omitted).

The Commission acknowledged that the pandemic had led to "a shift in the mail mix due to changes in demand, with significant volume declines for some Market Dominant products and significant volume increases for packages, the majority of which are classified as Competitive products." *Id.* at 27. However, it noted "[t]here [were] both cost and revenue implications associated with such shifts that [were] not yet fully clear." *Id.* In addition, it was "unclear if these shifts [would] be permanent or if volumes [would] return to their former levels in the future." *Id.*

The Commission rejected the commenters' argument that the density rate authority is flawed because in their view, the additional revenue realized from packages (which generally have higher contribution per piece in comparison with most Market Dominant mailpieces) during the pandemic has offset the revenue lost as a result of declines in Market Dominant mail. *Id.* at 28. The Commission found that "in terms of per-piece volume, the declines that have occurred with respect to Market Dominant mail far exceed[ed] the increases in packages." *Id.* Furthermore, the Commission explained that the density rate authority is designed to address the increase in per-unit costs caused by declines in volume

[27] Pub. L. No. 116-136, 134 Stat. 281 (2020).

per delivery point, and both the declines in volume and the increase in delivery points are exogenous factors outside of the Postal Service's direct control. *See id.* at 27-28. "Regardless of the contribution or revenue associated with packages versus other types of mail, the reality is that—as a result of the pandemic—there are fewer total mailpieces today over which the costs of servicing and maintaining the Postal Service's network can be distributed, which causes the per-unit cost of delivering the remaining mailpieces to increase." *Id.* at 28. It is these costs, which are outside of the Postal Service's direct control, rather than contribution or revenue associated with particular mailpieces, that the density rate authority is designed to address. *Id.* at 29.

The density formula is designed to estimate the expected increase in per-unit costs caused by an observed density decline by using the institutional cost ratio[28] as a proxy for the elasticity of unit costs with respect to density. Order No. 5763 at 94-95. Contrary to the mailers' claims, that calculation is sufficient to determine the necessary amount of density rate authority—per-unit revenue is not a necessary, or even reasonable, input. The increased revenue-per-piece for Competitive products does not affect the cost-per-piece of servicing the Postal Service's network. Per-piece revenue is not included in the density formula because it has no relation to the density-driven increase in per-unit costs.

In addition, the Commission uses the volume input that experiences the lesser decline (either Market Dominant products or total volume) in the density rate authority formula. *Id.* at 344; 39 C.F.R. § 3030.162(b)(2). This properly accounts for the role of Competitive products and benefits Market Dominant ratepayers. Order No. 5763 at 73-74, 99, 344. For example, if Market Dominant volume declines proportionally faster than Competitive product volume, the formula input will use total volume rather than Market Dominant volume, which reduces the resulting density rate authority eligible for use for each Market Dominant class. *Id.* at 344. Therefore, by design, healthy Competitive product volume would translate to a direct benefit to Market Dominant ratepayers. *Id.* Conversely, if Competitive product volume declines proportionally faster than Market Dominant volume, the formula input will use Market Dominant volume rather than total volume, which reduces the resulting density rate authority eligible for use for each Market Dominant class. *Id.* n.440. Thus, potential declines in the relative health of Competitive product volumes would not translate to additional Market Dominant rate authority. *Id.*

With regard to commenters' argument on the effect of price increases on mailers, the Commission noted that the final rules allow the Postal Service to retain density rate authority as unused (or banked) rate authority for purposes of 39 U.S.C. § 3622(d)(2)(C). *Id.* at 29; 39 C.F.R. § 3030.160(c)(3). "Thus, the Postal Service will be able to exercise its business judgment as to how much density-based rate authority to use in a given year[,]" taking into account of a variety of factors, including the effect of price increases on mailers. Order No. 5763 at 29.

---

[28] Institutional cost ratio is calculated as institutional costs for the most recently completed fiscal year divided by total costs for that fiscal year. 39 C.F.R. § 3030.162(b)(1).

With regard to commenters' argument that the additional $10 billion borrowing authority granted by the CARES Act to the Postal Service undermined the Commission's findings on the Postal Service's liquidity, the Commission found the additional borrowing authority was "limited to addressing short-term operating needs due to the COVID-19 emergency" and could not "be used to address the Postal Service's longer-term financial stability, outstanding debt, and capital expenses." *Id.* at 29-30 (citing CARES Act § 6001(b)). It is "the net losses and accumulated deficits that undermine the Postal Service's medium- and long-term financial stability" that the density rate authority, retirement rate authority, and non-compensatory product/class modifications are designed to address. Order No. 5763 at 30. Therefore, the additional borrowing authority granted by the CARES Act does not impact the Commission's analysis of the Postal Service's liquidity.

Finally, the Commission noted that "it is committed to reviewing the modified ratemaking system in 5 years to assess its performance, and to reviewing specific components of the modified ratemaking system sooner than 5 years if needed." *Id.* at 31. Because it was unknowable "how long the downturn [would] persist or what the long-term economic effects [would] be, either for the Postal Service or for mailers," the Commission stated it "[would] monitor the effects of the final rules on the Postal Service and on mailers in light of economic developments, and it [would] intervene as necessary if economic conditions prevent the final rules from operating as intended to achieve the objectives of section 3622."[29] The Commission determined that it is appropriate to review the modified ratemaking system in 5 years instead of at an earlier time, because "[a] thorough and insightful review must provide more than two rate cycles as data points to assess the impact" of the modified ratemaking system. Order No. 5763 at 267. In contrast, "[a]n abbreviated review period would not provide the Commission with sufficient data to evaluate the final rules in operation, account for outlying data, and determine the impact on mailers." *Id.* The Commission emphasized that it "retains the flexibility to review and adjust certain components of the system sooner than 5 years if serious ill effects are evident." *Id.* Even if the Commission were to determine to review the modified ratemaking system sooner than 5 years, "a holistic review of the system would also take place 5 years after implementation." *Id.* The Commission concluded that "[s]uch an approach provides more predictability and transparency" than an abbreviated review period. *Id.*

[29] *Id.* In 2022, two groups of petitioners requested that the Commission open rulemaking dockets to review the modified ratemaking system in light of the enactment of the Postal Service Reform Act of 2022, which eliminated the Postal Service's obligation to prefund RHBs. Docket No. RM2022-5, Petition for Rulemaking of the Association for Postal Commerce and Alliance of Nonprofit Mailers, April 11, 2022; Docket No. RM2022-6, Petition for Post-Legislation Review of the System for Regulating Market-Dominant Rates and Classes, April 11, 2022. The two petitions are currently pending before the Commission.

CHAPTER III. JUDICIAL AFFIRMANCE OF THE COMMISSION'S MODIFIED RATEMAKING SYSTEM

A. Introduction

Following the publication of Order No. 5763 in the *Federal Register*,[30] multiple mailers and the Postal Service petitioned the U.S. Court of Appeals for the District of Columbia Circuit (the D.C. Circuit) for review of the Commission's modified ratemaking system.[31] The mailers opposed the provision of any new rate authorities whereas the Postal Service argued that the modified ratemaking system would not confer sufficient rate authority. *Id.* On November 12, 2021, the D.C. Circuit affirmed all aspects of the Commission's modified ratemaking system and denied the petitions for review. *Id.* Thereafter, the mailers filed a petition for writ of certiorari before the U.S. Supreme Court, which was denied by the Supreme Court on June 27, 2022.[32]

B. The PAEA Authorized the Commission to Adopt the Modified Ratemaking System

The mailers argued that the Commission exceeded its statutory authority in allowing rate authorities in excess of the CPI price cap as required by 39 U.S.C. § 3622. *Nat'l Postal Pol'y Council*, 17 F.4th at 1190. The D.C. Circuit found that by its plain terms, section 3622(d)(3) ("the Commission may…make such modification or adopt such alternative system…."[33]) permits the Commission to "either make minor changes to the ratemaking system or replace it altogether." *Id.* at 1191.

The mailers contended that the alternative system adopted under section 3622(d)(3) must incorporate the CPI price cap requirement in section 3622(d)(1) because section 3622(d)(1) states that any system "shall" include such a cap. *Id.* The D.C. Circuit rejected this argument, finding that "system" most logically means the same thing in section 3622(d)(3) as it does in section 3622(a) and (d)(1)(A) and "includes rules that do not comply with the price cap." *Id.*

---

[30] System for Regulating Market Dominant Rates and Classifications, 85 Fed. Reg. 81,124.

[31] *Nat'l Postal Pol'y Council v. Postal Regul. Comm'n*, 17 F.4th 1184, 1187 (D.C. Cir. 2021).

[32] *Nat'l Postal Pol'y Council*, 17 F.4th 1184, *cert. denied*, 142 S. Ct. 2868 (2022).

[33] *Id.* (emphasis omitted) (quoting 39 U.S.C. § 3622(d)(3)).

The mailers also contended that because section 3622(d)(3) permits the Commission to review the system "established under" section 3622, any alternate system adopted must also comply with all of section 3622's requirements, including the CPI cap. *Id.* The D.C. Circuit also rejected this argument, finding that the phrase "established under" modifies only the system the Commission may review, not the alternative system it may adopt. *Id.* The court found that section 3622(d)(3) only requires that any changes to the system be "'necessary to achieve the objectives' in § 3622(b), but makes no mention of the CPI cap." *Id.* (quoting 39 U.S.C. § 3622(d)(3)).

The mailers further relied on the canon of statutory construction that the inclusion of a phrase in one provision and its absence in another is deliberate to argue that the exception to the price cap for emergencies in section 3622(d)(1)(E) demonstrates that Congress did not grant the Commission the authority to override the price cap in section 3622(d)(3). *Id.* The D.C. Circuit rejected this argument as well, finding that the two provisions use different words and are not otherwise parallel. *Id.*

The D.C. Circuit also reasoned that the mailers' narrow interpretation of section 3622(d)(3) would render section 3622(a) superfluous. *Id.* The court noted that section 3622(a) provides that the Commission may "revise" the ratemaking system "from time to time thereafter by regulation." *Id.* (quoting 39 U.S.C. § 3622(a)). The mailers' narrow interpretation of section 3622(d)(3) would render these words superfluous: "if the price cap is an immutable feature of the ratemaking system, then there is no meaningful difference between the Commission's authority to 'revise' the ratemaking system and its authority to adopt an 'alternative' ratemaking system after ten years." *Id.* at 1192.

The D.C. Circuit further observed that the legislative history also supports the Commission's interpretation of section 3622(d)(3). *Id.* The court found that section 3622(d)(3) was not in the versions of the bills initially passed by the House and Senate. *Id.* Rather, the Senate bill retained a price cap while the House bill contained a price cap that could be eliminated after notice and comment. *Id.* (citations omitted). Section 3622(d)(3) was added during the House-Senate Conference and thereafter enacted by Congress. *Id.* (citations omitted). The primary Senate sponsor of the conference bill, Senator Susan Collins, addressed the provision as follows:

> While this bill provides for a decade of rate stability, I continue to believe that the preferable approach was the permanent flexible rate cap that was included in the Senate-passed version of this legislation. But, on balance, this bill is simply too important, and that is why [the conferees] have reached this compromise to allow it to pass. We at least will see a decade of rate stability, and I believe the Postal [Regulatory] Commission, at the end of that decade, may well decide that it is best to continue with a CPI rate cap in place. It is also, obviously, possible for Congress to act to reimpose the rate cap after it expires.

Id. (citing 152 Cong. Rec. S11,675 (daily ed. Dec. 8, 2006) (statement of Sen. Collins)). Thus, the court found the Senator's remarks "reinforce the plain meaning of the statutory text." *Id.*

Finally, the mailers contended that the Commission's interpretation of the statute violates the nondelegation doctrine. *Id.* The D.C. Circuit rejected this argument, finding that a statutory delegation of authority is constitutional if Congress has provided an "intelligent principle" to which the delegatee (here, the Commission) is directed to conform,[34] and section 3622(d)(3) has provided such an "intelligent principle" by requiring the alterations to the ratemaking system be "necessary to achieve" the nine objectives in section3622(b). *Id.* at 1192-93 (quoting 39 U.S.C. § 3622(d)(3)).

C. Judicial Review Affirmed that the Commission's Modified Ratemaking System Was Reasonable

The mailers contended that the modified ratemaking system is arbitrary and capricious because it fails to achieve the statutory objectives in section 3622(b), and they raised issues specifically with the density rate authority and the Commission's decision not to reopen the record to allow comments on the impact of the COVID-19 pandemic. *Id.* at 1193.

The D.C. Circuit emphasized that the court's review is deferential because an agency need only articulate a "rational connection between the facts found and the choice made[,]" and the court is reluctant to interfere with an agency's "reasoned judgments about technical questions within its area of expertise." *Id.* (citations and internal marks omitted). In particular, the court found that two features of the regulatory regime weigh in favor of deference. First, section 3622(b) requires the Commission to consider nine objectives. The court's "review of agency decisions based on multi-factor balancing tests…is necessarily quite limited. [The court] may not merely substitute the balance [it] would strike for that the agency reached." *Id.* (citation omitted). Second, the Commission's decision depends on "'predictive judgments about the likely economic effects of a rule,' which are 'squarely within the ambit of the Commission's expertise.'" *Id.* (citation omitted).

Guided by this deferential standard of review, the court next analyzed the Commission's reasoning for why its modified ratemaking system is consistent with the statutory objectives in section 3622(b) and concluded that "the Commission articulated a rational connection between the statutory objectives and the decision it made." *Id.* at 1194-95. Therefore, the court held that the Commission's decision was not arbitrary and capricious in meeting the statutory objectives. *Id.* at 1195.

[34] *Id.* (citations omitted).

The mailers contended that the density rate authority is arbitrary and capricious because it fails to account for per-unit revenue and it will accelerate, rather than remedy, the decline in mail density. *Id.* The D.C. Circuit found that the Commission adequately justified its density rate authority. First, the Commission reasonably explained that the density rate authority is designed to offset increases in per-unit costs caused by declining mail density, not to offset contribution or revenue changes from individual mail classes. *Id.* (citing Order No. 5763 at 95). Second, the Commission reasonably explained that the mailers' argument that the density rate authority will accelerate the decline in mail density rested on the faulty premise that Market Dominant products are highly price sensitive. *Id.* (citing Order No. 5763 at 82). The Commission found that on the contrary, demand for Market Dominant products has been relatively price inelastic. *Id.* Therefore, the court found that the Commission reasonably believed the decrease in volume induced by the density rate authority to be less in proportional terms than the amount of density rate authority. *Id.*

Lastly, the mailers contended that the Commission erred by not reopening the record to consider evidence that the COVID-19 pandemic has caused volume increases in profitable packages, improving the Postal Service's financial condition and making density and other new rate authorities unnecessary. *Id.* at 1196. The D.C. Circuit held that the Commission adequately supported its decision not to reopen the record. *Id.* The court found that the Commission reasonably explained that the pandemic did not alter its finding that the initial ratemaking system failed to achieve the statutory objectives, because "[t]he Postal Service's finances remain[ed] unstable" and "the problems identified in Order No. 4257 with respect to pricing and operational efficiency and unreasonable rates [had] not abated." *Id.* (citing Order No. 5763 at 26-27). The Commission found that these problems "are expected to persist as long as the existing ratemaking system remains in effect, and nothing specific to the pandemic alters [its] findings with regard to these deficiencies." *Id.* (citing Order No. 5763 at 27). The court also noted that the Commission is committed to "interven[ing] as necessary if economic conditions prevent the final rules from operating as intended to achieve the objectives of section 3622." *Id.* (citing Order No. 5763 at 31).

The mailers argued that the Commission relied on data from 2019 and that the Postal Service's financial condition improved by mid-2020. *Id*. The D.C. Circuit found that the Commission reasonably explained that pricing authority should be determined by cost, not by revenue, and that "as a result of the pandemic[,] there are fewer total mailpieces today over which the costs of servicing and maintaining the Postal Service's network can be distributed." *Id.* (citing Order No. 5763 at 28-29, 95). The court further found that the Commission submitted new data in response on appeal that showed the Postal Service's financial condition worsened by the end of 2020. *Id.*

The Postal Service also challenged Order No. 5763 as arbitrary and capricious, but because it alleged the order did not confer enough rate authority to the Postal Service. *See id.* at 1196-98. As the Committee "is concerned with the size and timing of the [August 2021] rate increase and that the PAEA process did not account for the impact of the pandemic, including factors such as higher package revenues and emergency funding provided to the USPS[,]" the Committee does not appear to share the Postal Service's concern that the new rate authorities are insufficient. *See* H.R. Rep. No. 117-79, at 100. Therefore, the Commission does not discuss the D.C. Circuit's analysis of the Postal Service's arguments in detail in this Report. Suffice it to say, the D.C. Circuit found that the Commission reasonably explained why it rejected the Postal Service's arguments in Order No. 5763, and it affirmed Order No. 5763 in all aspects. *See Nat'l Postal Pol'y Council*, 17 F.4th at 1197-98.

CHAPTER IV. SUBSEQUENT MARKET DOMINANT RATE CASES FILED UNDER THE MODIFIED RATEMAKING SYSTEM

A. Introduction

After the Commission issued Order No. 5763, the modified ratemaking system took effect on January 14, 2021.[35] Multiple events then occurred under the modified ratemaking system, several of which occurred before the D.C. Circuit issued its decision in *National Postal Policy Council v. Postal Regulatory Commission*, 17 F.4th 1184 (D.C. Cir. 2021), on November 12, 2021. A description of these events follows.

On March 23, 2021, the Postal Service published its vision and 10-year plan to achieve financial sustainability and service excellence, referred to as the "Delivering for America Plan."[36] In this publication, the Postal Service announced its intent to implement "[a] more rational pricing approach – as approved by the Postal Regulatory Commission for [its] market-dominant products…." *Id.* at 7. The Postal Service stated that "[t]he PRC's new rules on market-dominant prices allow above-CPI price increases on the basis of certain factors, including declining density (pieces per delivery point) and retirement-related amortization costs. [The Postal Service] will apply judicious and prudent strategies to optimize revenues and contribution within applicable regulatory constraints." *Id.* at 38.

Pursuant to its rules, on April 6, 2021, the Commission determined that the following amounts of Market Dominant rate authority (in addition to rate authority based on the change in the CPI-U) would be available to the Postal Service in the next fiscal year: 4.500 percent via density-based rate authority; 1.062 percent via retirement-based rate authority, and 2 percentage points of non-compensatory rate authority limited to Periodicals and Package Services.[37]

On May 28, 2021, the Postal Service filed the first general Market Dominant rate case under the modified ratemaking system.[38] On July 19, 2021, the Commission issued its order in this rate case, approving the planned price adjustments after finding that they were consistent

---

[35] Order No. 5763 at 370 (stating that the revised rules are to take effect 30 days after publication in the *Federal Register);* System for Regulating Market Dominant Rates and Classifications, 85 Fed. Reg. 81,124.

[36] United States Postal Service, Delivering for America: Our Vision and Ten-Year Plan to Achieve Financial Sustainability and Service Excellence, March 23, 2021, available at *https://about.usps.com/what/strategic-plans/delivering-for-america/assets/USPS_Delivering-For-America.pdf* (Delivering for America Plan).

[37] Docket No. ACR2020, Determination of Available Market Dominant Rate Authority, April 6, 2021, at 6 (Order No. 5861).

[38] Docket No. R2021-2, United States Postal Service Notice of Market-Dominant Price Change, May 28, 2021 (May 28, 2021 Postal Service Notice).

with relevant statutes and regulations.[39] The price adjustments took effect on August 29, 2021 (the August 2021 rate increase). Order No. 5937 at 130.[40]

On September 15, 2021, the Postal Service filed an updated Schedule for Regular and Predictable Rate Adjustments with the Commission.[41] The Postal Service indicated its plan to forgo increasing any Market Dominant rates in January 2022 and instead implement its next rate adjustment on July 10, 2022. Updated Schedule at 1, 3. Previously under the initial ratemaking system, the Postal Service established a schedule of implementing general Market Dominant price adjustments each January.[42] In accordance with its previous schedule, the last general Market Dominant price adjustments under the initial ratemaking system took effect on January 24, 2021.[43] In the Updated Schedule, the Postal Service articulated its expectation that it would adjust rates for Market Dominant products in January and July of each year (with filings submitted to the Commission in the preceding October and April, respectively). Updated Schedule at 3. Further, the Postal Service announced its intent to use available pricing authority judiciously along with its expectation that its financial condition would require the application of "most or all pricing authority available on the date of filing." *Id.*

On November 12, 2021, the D.C. Circuit issued its decision in *National Postal Policy Council v. Postal Regulatory Commission*, 17 F.4th 1184 (D.C. Cir. 2021), which affirmed the Commission's final rules in all aspects.

As the Postal Service stated in its Updated Schedule, it did not implement a general Market Dominant rate increase in January 2022.[44]

Pursuant to its rules on March 29, 2022, the Commission determined that the following amounts of Market Dominant rate authority (in addition to rate authority based on the change in the CPI-U) would be available to the Postal Service in the next fiscal year: 0.583 percent via density-based rate authority; 0.785 percent via retirement-based rate authority, and 2 percentage points of non-compensatory rate authority limited to Periodicals and Package Services.[45] The Commission took into account that section

---

[39] Docket No. R2021-2, Order on Price Adjustments for First-Class Mail, USPS Marketing Mail, Periodicals, Package Services, and Special Services Products and Related Mail Classification Changes, July 19, 2021, at 2, 129-30 (Order No. 5937).

[40] House Report 117-79 was issued on July 1, 2021, after the Postal Service filed its first rate case on May 28, 2021, but before the Commission analyzed the Postal Service's notice of price adjustments in Order No. 5937 (issued on July 19, 2021) and before the D.C. Circuit affirmed the Commission's modified ratemaking system on November 12, 2021. H.R. Rep. No. 117-79; *Nat'l Postal Pol'y Council*, 17 F.4th 1184.

[41] United States Postal Service Filing of Updated Schedule of Regular and Predictable Rate Adjustments, September 15, 2021, available at *https://www.prc.gov/docs/119/119748/USPS%20Schedule%20for%20Rate%20Adjustments.pdf* (Updated Schedule).

[42] Docket No. R2008-1, United States Postal Service Filing of Schedule of Regular and Predictable Price Changes, February 11, 2008, at 3.

[43] Docket No. R2021-1, Order on Price Adjustments for First-Class Mail, USPS Marketing Mail, Periodicals, Package Services, and Special Services Products and Related Mail Classification Changes, November 18, 2020, at 115-16 (Order No. 5757).

[44] On January 11, 2022, the Postal Service complied with 39 C.F.R. § 3030.102 by specifying that this schedule would continue through Calendar Year 2024. United States Postal Service Filing of Updated Schedule for Regular and Predictable Rate Adjustments, January 11, 2022, available at *https://www.prc.gov//docs/120/120673/Rate%20Change%20Schedule%20%28FY%202021%20ACR%29.pdf*.

[45] Docket No. ACR2021, Determination of Available Market Dominant Rate Authority, March 29, 2022, at 12 (Order No. 6130).

102(b)(1) of the Postal Service Reform Act of 2022 (PSRA) amended 5 U.S.C. § 8909a to remove the requirement for the Postal Service to make specific payments for RHBs by striking subsection (d) and replacing it with new language that does not include the same requirement.[46] The PSRA set the amounts due for those RHB payments to zero. Order No. 6130 at 8. The other components of the total amortization payment—specified payments to the Civil Service Retirement System (CSRS) and the Federal Employees Retirement System (FERS)—remain unaffected by the PSRA. *Id.* The inputs to the Commission's formula were adjusted to reflect the impact of the PSRA by removing RHBs from the targeted retirement obligations, which automatically results in decreased retirement-based rate authority by reducing the amount of that full payment. *Id.* at 9. The Commission observed that "[b]y design, the formula spreads out the impact of any changes to the inputs of the formula over the remainder of the phase-in period." *Id.* at 9 n.13. The Commission directed the Postal Service to remit at least $39.189 million towards the CSRS and FERS liabilities no later than September 30, 2022. *Id.* at 12.

On April 6, 2022, the Postal Service filed the second general Market Dominant rate case under the modified ratemaking system.[47] On May 27, 2022, the Commission issued its order in this rate case, approving the planned price adjustments after finding that they were consistent with relevant statutes and regulations.[48] The price adjustments took effect on July 10, 2022 (the July 2022 rate increase). Order No. 6188 at 106.

On October 7, 2022, the Postal Service filed the third general Market Dominant rate case under the modified ratemaking system.[49] On November 28, 2022, the Commission issued its order in this rate case, approving the planned price adjustments with some modifications, after finding that they were consistent with relevant statutes and regulations.[50] The price adjustments will take effect on January 22, 2023 (the January 2023 rate increase). Order No. 6341 at 108.

A summary of the rate adjustment authority available to the Postal Service (not including banked, or unused, rate authority) in Docket Nos. R2021-2 (the August 2021 rate increase), R2022-1 (the July 2022 rate increase), and R2023-1 (the January 2023 rate increase), based on different ratemaking authorities, appears in Table IV-1.

---

[46] Order No. 6130 at 8 (citing Postal Service Reform Act of 2022, H.R. 3076, 117th Cong. § 102(b)(1)).

[47] Docket No. R2022-1, United States Postal Service Notice of Market-Dominant Price Change, April 6, 2022 (April 6, 2022 Postal Service Notice).

[48] Docket No. R2022-1, Order on Price Adjustments for First-Class Mail, USPS Marketing Mail, Periodicals, Package Services, and Special Services Products and Related Mail Classification Changes, May 27, 2022, at 2, 105-06 (Order No. 6188).

[49] Docket No. R2023-1, United States Postal Service Notice of Market-Dominant Price Change, October 7, 2022 (October 7, 2022 Postal Service Notice).

[50] Docket No. R2023-1, Order on Price Adjustments for First-Class Mail, USPS Marketing Mail, Periodicals, Package Services, and Special Services Products and Related Mail Classification Changes, November 28, 2022, at 2, 107-08 (Order No. 6341).

Table IV-1
Available Rate Adjustment Authority (By Ratemaking Authority) in Docket Nos. R2021-2, R2022-1, and R2023-1

Ratemaking Authority	Docket No. R2021-2[a]	Docket No. R2022-1[b]	Docket No. R2023-1[c]
CPI-U	1.244%	5.135%	4.200%
Density	4.500%	0.583%	0.000%
Retirement	1.062%	0.785%	0.000%
Subtotal for Compensatory Classes[d]	**6.806%**	**6.503%**	**4.200%**
Non-Compensatory[e]	2.000%	2.000%	0.000%
Total[f]	**8.806%**	**8.503%**	**4.200%**

[a] Order No. 5937 at 4, Table II-1.
[b] Order No. 6188 at 4, Table II-1.
[c] Order No. 6341 at 5, Table II-1.
[d] The subtotal for compensatory classes includes CPI-U, density, and retirement rate authorities, which are available to all compensatory classes. Compensatory classes include First-Class Mail, USPS Marketing Mail, and Special Services. They account for the vast majority of the Postal Service's volume and revenue. Order No. 5937 at 4, Table II-1; Order No. 6188 at 4, Table II-1; Order No. 6341 at 5, Table II-1.
[e] The 2 percent non-compensatory rate authority is only available for non-compensatory mail classes per fiscal year, not all mail classes. Non-compensatory classes include Periodicals and Package Services, which account for only a small amount of the Postal Service's volume and revenue. Order No. 5937 at 4, Table II-1; Order No. 6188 at 4, Table II-1; Order No. 6341 at 5, Table II-1.
[f] This does not include the banked, or unused, rate authority.

B. The August 2021 Rate Increase

1. Size of the August 2021 Rate Increase

On May 28, 2021, the Postal Service notified the Commission and the general public of the determination of the Governors of the Postal Service to adjust Market Dominant rates of general applicability, using the new rate authorities available for the first time under the modified ratemaking system, effective August 29, 2021. May 28, 2021 Postal Service Notice at 1. Postmaster General and Chief Executive Officer Louis DeJoy observed that "[f]or the past 14 years, the Postal Service has had limited pricing authority to respond to changing market realities."[51] "As part of [the Postal Service's] 10-year plan to achieve financial sustainability and service excellence," Postmaster General DeJoy also emphasized the Postal Service's commitment "to judiciously implementing a rational pricing approach that helps enable us to remain viable and competitive and offer reliable postal services that are among the most affordable in the world." *Id.* Chief Financial Officer and Executive Vice President Joseph Corbett explained that "[a]ligning our prices for market-dominant products will allow us to grow revenue and help achieve financial sustainability to fulfill our universal service mission." *Id.* at 2.

[51] United States Postal Service, National News, With Commitment to Affordability and Financial Sustainability, U.S. Postal Service Proceeds with Request for Postal Rate Change, May 28, 2021, at 1, available at *https://about.usps.com/newsroom/national-releases/2021/0528-usps-proceeds-with-request-for-postal-rate-change.pdf*.

By contrast, the Docket No. R2021-2 commenters argued that the August 2021 rate increase was not necessary to support the Postal Service's financial health, because the Postal Service's financial conditions improved during the COVID-19 pandemic. *See* Order No. 5937 at 53-54.

The Commission reiterated its findings in Order No. 4257 that the Postal Service's financial stability had not been achieved under the initial ratemaking system, because the Postal Service suffered a net loss every year in the decade after the PAEA was enacted, had not been able to achieve retained earnings due to accumulated net losses, defaulted on the vast majority of its statutory payment obligations, had not had any working capital, its capital expenditure ratio had declined, and its debt ratio had steadily increased. *Id.* at 54. The additional ratemaking authorities are designed to address discrete sources of costs over which the Postal Service does not have direct control, and they are necessary to lead to its financial stability (Objective 5) by alleviating near-term financial pressure. *Id.* at 54-55. Furthermore, financial pressure due to such costs inhibited the Postal Service's ability to make needed capital investments in order to reduce costs and improve efficiency (Objective 1). *Id.* at 55.

The Commission confirmed that these findings remained applicable in FY 2020. *Id.* In its FY 2020 Financial Analysis, the Commission found that the Postal Service's liabilities continued to far exceed its assets, and its ability to make sufficient capital investments continued to be limited in FY 2020.[52] Although the COVID-19 pandemic caused large volume increases for Competitive products and large volume decreases for Market Dominant products, revenue gains associated with increased Competitive volumes were significantly offset by revenue declines associated with decreased Market Dominant volumes in FY 2020. Order No. 5937 at 55 (citing FY 2020 Financial Analysis at 11-14). And although the Postal Service's net operating revenue for FY 2020 was higher than it was in FY 2019, its FY 2020 net operating expenses were also higher, resulting in a net loss for FY 2020 that was greater than its net loss for FY 2019, before the COVID-19 pandemic began. *Id.* (citing FY 2020 Financial Analysis at 11). In addition, although the Postal Service's liquidity improved in FY 2020 over FY 2019 largely because of the additional $10 billion borrowing authority made available by the CARES Act, its overall financial position remained poor, with an FY 2020 net loss of $9.2 billion and an FY 2020 net deficit of $80.7 billion. *Id.* at 56 (citing FY 2020 Financial Analysis at 6, 38-42).

Furthermore, the Commission found that the Postal Service's unaudited financial information (current through May 2021) confirmed that it remained financially unstable in 2021.[53] The May 2021 Unaudited Financial Report showed that year-to-date, the Postal Service's net loss had been approximately $1.3 billion and that its net loss for May 2021

---

[52] *Id.* (citing Docket No. ACR2020, Postal Regulatory Commission, Financial Analysis of United States Postal Service Financial Results and 10-K Statement, Fiscal Year 2020, April 26, 2021, at 30-38 (FY 2020 Financial Analysis)).

[53] *Id.* at 56 (citing USPS Preliminary Financial Information, Unaudited, May 2021, file "2021.6.24 May 2021 Financial Report to the PRC.pdf," June 24, 2021, available at *https://www.prc.gov/docs/119/119055/2021.6.24%20May%202021%20Financial%20Report%20to%20the%20PRC.pdf* (May 2021 Unaudited Financial Report)).

alone was $846 million. *Id.* (citing May 2021 Unaudited Financial Report at 1). The month of May alone also shows a reversal in the mail mix trend with Market Dominant volumes increasing 16.9 percent over the same period last year and Competitive volumes decreasing 21.4 percent. *Id.* at 57 (citing May 2021 Unaudited Financial Report at 1). The Commission noted that "[g]iven the shifts in volume trends that have been occurring since the start of the COVID-19 pandemic, there are many questions as to what the mail mix will look like in the near term," including volume changes and revenue changes in Competitive products vis-à-vis Market Dominant products. *Id.*

Therefore, the Commission concluded that there was nothing in the most recently available information that would lead it to change its conclusions in Docket No. RM2017-3 that the modified ratemaking authorities are necessary for the Postal Service to achieve financial stability, consistent with Objective 5. *Id.* at 58. Finally, the Commission confirmed that the size of the rate increases for each class of Market Dominant mail complied with the price cap limitations of the modified ratemaking system. *Id.* at 76, 92, 106, 117, 124.

2. Timing of the August 2021 Rate Increase

The Postal Service articulated its rationale for implementing the first rate increase under the modified ratemaking system in August 2021, stating:

> Given the recent adoption of the Commission's amendments to the ratemaking system and the urgent need to begin addressing the Postal Service's financial challenges through implementation of more rational pricing, after many years of a prior system that the Commission appropriately found to be a barrier to financial sustainability, the Governors have determined to shift from the Postal Service's previous January implementation schedule for annual price increases to an August timeline for 2021.

May 28, 2021 Postal Service Notice at 1 (footnote omitted).

On the other hand, commenters argued that the August 2021 rate increase was contrary to the schedule for regular and predictable rate adjustments, which reflected that price adjustments were expected to occur each January. Order No. 5937 at 43-46.

The Commission stated that under the initial ratemaking system, the Postal Service was required to file a schedule for regular and predictable rate changes with the Commission, and it most recently filed such a schedule with the Commission in Docket No. R2012-3, announcing its plan to implement price adjustments each January.[54] The Commission pointed out that over the years, the Postal Service mostly followed this schedule, but also

[54] *Id.* at 46-47 (citing Docket No. R2012-3, United States Postal Service Filing of Updated Schedule of Regular and Predictable Price Changes, October 18, 2011, at 3).

deviated from the schedule on several occasions. *Id.* at 47. However, its proposed price adjustments were never rejected, remanded, or delayed on this basis, because the Commission found that the deviations from the schedule were "explained by external influences observable to mailers." *Id.* (citing Order No. 4257 at 62).

Despite this finding, the Commission modified two aspects of the rule governing the timing and contents requirements for the Postal Service's schedule to "improve the mailing community's ability to plan budgets" and "improve accessibility of information for all mailers." *Id.* at 48 (citation omitted). First, the Commission specified that the Postal Service's filing be submitted "annually with the Commission at the time of filing the Postal Service's section 3652 report." 39 C.F.R. § 3030.102(b). Second, the Commission specified that the Postal Service's schedule "[p]rovide estimated filing and implementation dates (month and year) for future rate adjustments for each class of mail expected over a minimum of the next 3 years." *Id.* § 3030.102(a)(2).

The first modification governing the timing of the filing was not effective at the time that the Postal Service filed its 2020 section 3652 report. Order No. 5937 at 48. The Postal Service's section 3652 report is filed with the Commission in late December each year as it is due "no later than 90 days after the end of each [fiscal] year." 39 U.S.C. § 3652(a). The Postal Service's most recent section 3652 report at the time the first rate case under the modified ratemaking system was pending was filed on December 29, 2020,[55] and the requirement that the Postal Service annually update the schedule at the time of the filing of that report did not go into effect until January 14, 2021.[56] Thus, the Commission found it did not have a basis pursuant to the new rule to find the Postal Service out of compliance with the annual filing requirement. Order No. 5937 at 49. Similarly, the Commission found that the second modification governing the contents of the schedule would apply when filing the schedule, which consistent with the rules would occur in late December 2021 (several months later than the issuance of Order No. 5937 in July 2021). *Id.* Therefore, the Commission determined not to reject, delay, or remand the Postal Service's price adjustment proposal that deviated from the schedule. *Id.*

Nevertheless, the Commission noted that it is "sympathetic to the mailers' needs to have regular and transparent information about upcoming price adjustments to allow for advance budgeting." *Id.* It observed that it was "an unfortunate coincidence that the timing of the finalization of the new rules was such that it relieved the Postal Service of the annual filing requirement of an updated schedule until later [in 2021]." *Id.* The Commission stated its intent to watch this issue "closely," and that if the revised rule proves to be ineffective at "ensuring regular and transparent information is available regarding future price adjustments," the Commission "would consider changes to 39 C.F.R. § 3030.102 in its 5-year review of the Market Dominant ratemaking system." *Id.* at 49-50.

[55] *See* Docket No. ACR2020, United States Postal Service FY 2020 Annual Compliance Report, December 29, 2020.

[56] Order No. 5763 at 370 (stating that the revised rules are to take effect 30 days after publication in the *Federal Register);* System for Regulating Market Dominant Rates and Classifications, 85 Fed. Reg. 81,124.

In response to commenters' claim that the lack of updated schedule and proposed August 2021 implementation date undermined Objective 2 (create predictability and stability in rates), the Commission noted that throughout the nearly 4-year rulemaking process in Docket No. RM2017-3, the Postal Service emphasized its need for additional rate authority beyond the CPI-U price cap. *Id.* at 50-51. Mailers and the Postal Service appealed Order No. 5763 to the D.C. Circuit. *Id.* at 51. In March 2021, the Postal Service publicly acknowledged its plans to file a rate adjustment proceeding utilizing the new rate authorities in its Delivering for America Plan and in a filing before the Commission. *Id.* Given these facts, the Commission found the timing of price adjustments was "dictated by external circumstances," like the final rules going to into effect and the D.C. Circuit appeal, but that "mailers and postal customers were aware of those circumstances and the Postal Service indicated its intended plans through formal and informal channels." *Id.* at 52. Therefore, the Commission found the price adjustment and August implementation date did not undermine achievement of Objective 2. *Id.*

In response to a commenter's claim that the Postal Service adjusts rates once per year consistent with Objectives 2 (create predictability and stability in rates) and 8 (establish and maintain a just and reasonable schedule for rates and classifications), and not twice per year as it happened in 2021, the Commission noted that the PAEA does not limit how frequently the Postal Service can adjust rates. *Id.* Furthermore, the Commission previously found that allowing the Postal Service to exercise broad discretion over the timing of price changes was an important element of Objective 4 (allow the Postal Service pricing flexibility). *Id.* (citing Order No. 4257 at 144). The Commission also previously found that the timing of price adjustments, including a situation where two price adjustments were filed within a 12-month period, was predictable and stable consistent with Objective 2. *Id.* (citing Order No. 4257 at 60, 143). The Commission found Objective 8, which focuses on whether the entire rate schedule threatens the financial integrity of the Postal Service or is excessive to mailers, is not implicated by the timing of price adjustments. *Id.* (citing Order No. 4257 at 113, 226).

C. The July 2022 Rate Increase

1. Size of the July 2022 Rate Increase

On April 6, 2022, the Postal Service notified the Commission and the general public of the determination of the Governors of the Postal Service to adjust Market Dominant rates of general applicability, using the new rate authorities available for the second time under the modified ratemaking system, effective July 10, 2022. April 6, 2022 Postal Service Notice at 1. The Postal Service announced that its Governors determined to use virtually all of the rate adjustment authority under the modified ratemaking system, explaining that "price cases are an integral component of [the Postal Service's Delivering for America] plan." *Id.*

In contrast, commenters in Docket No. R2022-1 argued that the July 2022 rate increase was unreasonable because the Postal Service's financial health improved as a result of the PSRA relieving the Postal Service of $57 billion in long-term liabilities and from having to prefund a portion of its pension liabilities. Order No. 6188 at 16.

The Commission emphasized at the outset that the amount of rate authority available to the Postal Service is a settled issue because the D.C. Circuit rejected similar arguments and affirmed all aspects of the modified ratemaking system in *National Postal Policy Council v. Postal Regulatory Commission*, 17 F.4th 1184 (D.C. Cir. 2021). *Id.* at 17. The Commission found that "[r]elitigating the necessity of the rate authority available to the Postal Service is inappropriate in the context of this proceeding as the Commission's review is narrowly tailored to ensuring the planned price adjustments comply with applicable law." *Id.* (citing 39 C.F.R. § 3030.126(b)). The Commission further found that neither the regulations nor the *National Postal Policy Council* decision requires review of the current financial conditions of the Postal Service to determine if rate authority may be used in individual rate adjustment proceedings. *Id.*

The Commission explained that the calculation of the retirement rate authority "automatically incorporated the fact that the PSRA set the payments due for specific Retiree Health Benefits to zero." *Id.* at 18. The Commission also noted that "it plans to review the modified ratemaking system 5 years after implementation and that such a review would necessarily include an assessment of the Postal Service's overall financial health in conjunction with consideration of whether the objectives of 39 U.S.C. § 3622(b) are being achieved…." *Id.* (citing Order No. 5763 at 267). The Commission further noted that the Postal Service is not required to provide an explanation for its proposed price increases considering its financial position, financial needs, and the PSRA. *Id.* In fact, requiring such an explanation would be inconsistent with 39 C.F.R. part 3030. *Id.* at 18-19.

Commenters also argued that the Postal Service's decision to use nearly all of its rate authority and the resulting amount of the increase represented unreasonably monopolistic behavior. *Id.* at 19-20. However, as detailed in Order No. 4257 and Order No. 5763, the Commission found the new rate authorities were necessary for the achievement of financial stability (including retained earnings) for the Postal Service, and the Commission targeted the new rate authorities to address discrete sources of costs over which the Postal Service does not have direct control. *Id.* at 21-22. The Commission pointed out that "the most substantial amount of rate authority available to the Postal Service in this proceeding (*i.e.*, 5.135 percent for each class) is a result of the change in inflation and would have been available to the Postal Service under the initial ratemaking system and was not altered by the modified ratemaking system." *Id.* at 22 (citing 39 U.S.C. § 3622(d)(1)(A); 39 C.F.R. part 3030, subpart C).

The Commission reaffirmed its statement in Order No. 5763 that it expected the Postal Service to use its business judgment to determine how to best utilize the ratemaking authority. *Id.* (citing Order No. 5763 at 81, 270). However, the Commission recognized that it is not inconsistent with this expectation for the Postal Service to determine in its business judgment to use nearly all of its available rate authority, which is within the scope of its price-setting discretion. *Id.* at 23. Furthermore, the Commission noted that its review was limited to whether the planned price adjustments comply with applicable law, and nothing in the applicable law limits the Postal Service from using the full amount of rate authority available to it. *Id.* at 23-24. Finally, the Commission confirmed that the size of the rate increases for each class of Market Dominant mail complied with the price cap limitations of the modified ratemaking system. *Id.* at 47, 65, 82, 90, 98.

2. Timing of the July 2022 Rate Increase

Consistent with its Updated Schedule, the Postal Service did not implement a rate increase in January 2022 and instead implemented its next general Market Dominant rate increase on July 10, 2022. April 6, 2022 Postal Service Notice at 1. This July 2022 rate increase was implemented 11 months after the August 2021 rate increase.

Several commenters objected to the Postal Service's plan to change prices twice per year starting with the July 2022 rate increase, instead of once per year as it did previously under the initial ratemaking system. *Id.* at 35-36.

The Postal Service filed its annual update to its price adjustment schedule on January 11, 2022, stating that it intends to "implement price changes for all Market Dominant classes in January and July...with the filings occurring in the preceding October and April."[57] The Commission found that the Postal Service was in compliance with the requirements of 39 U.S.C. § 3622(d)(1)(B) and 39 C.F.R. § 3030.102, and "[n]othing in the statute or regulations dictates the frequency of price adjustments or the timing of when they are to occur." *Id.* at 37. Nevertheless, the Commission encouraged the Postal Service to work with mailers to set a schedule "that minimizes costs and disruptions to the largest extent possible." *Id.*

The Commission notes that despite changing the rate adjustment frequency from once per year to twice per year, the Postal Service remains limited to the amount of rate authorities determined by the Commission to be available during the Annual Compliance Review for the entire year. In other words, the Postal Service cannot increase the total amount of rate increase in each year as a result of adjusting rates twice per year instead of once per year. This is what will happen in the January 2023 rate increase, in which the Postal Service has zero rate authorities available for density, retirement, and non-compensatory classes, because it has used the entirety of those rate authorities in the July 2022 rate increase following the Commission's determination of available rate authorities in Docket No. ACR2021 in March 2022. *See infra* Section IV.D.

In addition, the Commission notes that the Postal Service would have been able to adjust rates twice per year instead of once per year under the initial ratemaking system as well. Under the initial ratemaking system, the Commission required the Postal Service to maintain a schedule for regular and predictable rate changes on file with the Commission

---

[57] Order No. 6188 at 36-37 (citing United States Postal Service Filing of Updated Schedule for Regular and Predictable Rate Adjustments, January 11, 2022, Schedule for Regular and Predictable Rate Adjustments – Effective through Calendar Year 2024, available at *https://www.prc.gov//docs/120/120673/Rate%20Change%20Schedule%20%28FY%202021%20ACR%29.pdf*).

that would be displayed on the Commission's website.[58] The rule also required that the schedule provide mailers with estimated implementation dates for future price increases for each class of mail as well as an explanation that would allow mailers to predict with reasonable accuracy the amounts of future rate changes.[59] The rule also provided that the Postal Service file a revised schedule and explanation with the Commission "[w]henever the Postal Service deems it appropriate" to change the schedule and allowed the Postal Service to vary rate adjustments from those estimated by the schedule "for good cause shown."[60] Nothing in these initial rules for rate adjustment schedule precluded the Postal Service from adjusting rates twice per year instead of once per year as it did. Similarly, as discussed above, nothing in the modified rules precludes the Postal Service from adjusting rates twice per year. In other words, the Postal Service's ability to adjust rates at a frequency it chooses is not a new feature of the modified ratemaking system. The authority to establish reasonable and equitable classes of mail and rates of postage is vested primarily in the Governors of the Postal Service and there is no statutory limitation on the frequency of rate adjustments. 39 U.S.C. § 404(b).

D. The January 2023 Rate Increase

1. Size of the January 2023 Rate Increase

On October 7, 2022, the Postal Service notified the Commission and the general public of the determination of the Governors of the Postal Service to adjust Market Dominant rates of general applicability for the third time under the modified ratemaking system, effective January 22, 2023. October 7, 2022 Postal Service Notice at 1. The Postal Service stated that "[t]he Governors have determined to use virtually all of [the available rate] authority." *Id.* It pointed out that its "Delivering for America plan sets forth a balanced array of initiatives to achieve financial sustainability and service excellence," and rate adjustments "are an integral component of that plan." *Id.*

The Commission reiterated its findings in Order No. 4257 and Order No. 5763, *i.e.*, the Postal Service had not achieved financial stability (including retained earnings) under the initial ratemaking system, and the modified ratemaking system, including the additional forms of rate authorities, was necessary to achieve the statutory objectives. *See* Order No. 6341 at 20-21. The Commission noted that the D.C. Circuit affirmed the modified ratemaking system, finding that "the Commission articulated a rational connection between the statutory objectives and the decision it made." *Id.* at 21 (citing *Nat'l Postal Pol'y Council*, 17 F.4th at 1195).

[58] Docket No. RM2007-1, Order Establishing Ratemaking Regulations for Market Dominant and Competitive Products, October 29, 2007, at 114 (Order No. 43) (displaying former 39 C.F.R. § 3010.7(a)).

[59] *Id.* (displaying former 39 C.F.R. § 3010.7(b), (c)).

[60] *Id.* at 115 (displaying former 39 C.F.R. § 3010.7(e), (f)).

The Commission reviewed and addressed public comments criticizing the magnitude and effects of the planned rate increase. *See* Order No. 6341 at 17-27.

The Commission observed that the commenters' arguments about the magnitude of recent price adjustments were largely targeted at the August 2021 and the July 2022 rate increases, which were outside the scope of reviewing the planned January 2023 rate increase. *Id.* at 21. More importantly, nearly all of the rate authority available to the Postal Service for application in its planned January 2023 rate increase was based on the CPI-U rate authority, which would have been available to the Postal Service under the initial ratemaking system as well. *Id.* at 21-22.

Additionally, the Commission reemphasized that the Governors of the Postal Service, not the Commission, set the rates for postal services and are in the best position to use its business judgment to determine how to best utilize the rate authority and how to set specific rates. *Id.* at 22. The Commission explained that the Governors' decision to use nearly all of the Postal Service's available rate authority, as planned for the January 2023 rate increase, is within the scope of this exercise of discretion. *Id.* at 22-23.

With regard to the commenter's concern about lack of control over the Postal Service's business judgment and its accountability in light of the price increases, the Commission noted that in addition to itself, Congress, the U.S. Government Accountability Office, and the Postal Service Office of Inspector General have oversight authority "to hold the Postal Service accountable for its financial and operational performance." *Id.* at 23 (citing Order No. 5763 at 347 n.446). Although commenters may be dissatisfied with the level at which these bodies have acted to constrain the Postal Service's recent price increases, the Commission observed that the commenters' dissatisfaction "does not diminish the fact that several outside bodies retain oversight authority over the Postal Service…." Order No. 6341 at 23.

With regard to a suggestion that the Commission should act to protect mailers from price increases, the Commission stated that there is no basis to find that the Postal Service cannot use the full scope of the rate authority granted to it, and that the Commission's review is limited to whether the planned price adjustments comply with applicable law. *Id.* (citing 39 C.F.R. § 3030.126(b)). Applicable law is defined as the applicable requirements of 39 C.F.R. part 3030, Commission directives and orders, and 39 U.S.C. §§ 3626, 3627, and 3629. Order No. 6341 at 23 (citing 39 C.F.R. § 3030.126(b)). The Commission found that nothing in the applicable law limits the Postal Service from using the full rate authority available for the planned January 2023 rate increase. Order No. 6341 at 23. After reviewing the Postal Service's proposed price adjustments, with the revisions described in Order No. 6341, the Commission found that they comply with applicable law. *Id.* at 2, 107.

With regard to a commenter's concern that the Postal Service did not adequately explain its pricing strategy and plans to use its revenue, the Commission noted such an explanation is not required by the regulations, which the commenter also conceded. *Id.* at 25 (citing 39 C.F.R. §§ 3030.122, 3030.123). Although the Commission declined to require such an explanation be provided in the docketed proceeding, the Commission reiterated encouragement to the Postal Service to communicate its pricing strategies to better enable mailers and stakeholders to understand the rationale behind pricing decisions and how the Postal Service plans to use the revenue collected. Order No. 6341 at 25.

With regard to commenters' assertions that price increases would lead to decreased volumes and irreversible harm to the postal industry, the Commission found that it addressed similar arguments in Order No. 5763. *Id.* at 26 (citing Order No. 5763 at 81-84, 268-70). Specifically, in Order No. 5763, the Commission found that the Governors of the Postal Service set the rates and are in the best position to exercise business judgment about how to best utilize the pricing authority. Order No. 6341 at 25 (citing Order No. 5763 at 81, 270). The Commission stated that demand for Market Dominant products has been relatively price inelastic, meaning that any decrease in volume induced by the price increase is expected to be less, in proportional terms, than the amount of the price increase. Order No. 6341 at 26 (citing Order No. 5763 at 82). The Commission also noted that it could revisit the issue sooner than the planned 5-year review, if price elasticities for Market Dominant products changed and volume effects were outside the expected range. Order No. 6341 at 26 (citing Order No. 5763 at 83). The Commission noted that the D.C. Circuit affirmed Order No. 5763, holding that it was not irrational for the Commission to reject the argument that price increases enabled by additional rate authorities would accelerate volume loss and that a disagreement over price elasticities "is insufficient to invalidate the Commission's order, as [the] court defers to the Commission's reasonable economic assumptions and predictions." Order No. 6341 at 26 (quoting *Nat'l Postal Pol'y Council*, 17 F.4th at 1195). The Commission found that commenters did not raise different alleged harms in this proceeding than those considered in Order No. 5763, and that they did not provide evidence that volume effects outside the expected range had occurred or would imminently occur. Order No. 6341 at 26.

With regard to a commenter's concern that the frequency of price adjustments does not allow for empirical data concerning the impact of a prior price adjustment to be compiled before a new price adjustment proceeding is filed, the Commission noted that nothing in the statute or regulations dictates the frequency of price adjustments or the timing of when they are to occur. *Id.* Nevertheless, the Commission encouraged the Postal Service to review and analyze data concerning the effects of price increases as soon as they become available and expeditiously incorporate the lessons learned from the data in future price adjustment proposals. *Id.* at 26-27.

2. Timing of the January 2023 Rate Increase

As the Postal Service stated in its annual update to its price adjustment schedule on January 11, 2022, it intends to "implement price changes for all Market Dominant classes in January and July...with the filings occurring in the preceding October and April…."[61] Following the July 2022 rate increase, the Postal Service proposed to increase rates in January 2023, consistent with its price adjustment schedule.

Two commenters opposed the Postal Service changing prices for Market Dominant products twice per calendar year, because multiple price changes require more information technology and other resources from the mailers to adjust to such price changes. Order No. 6341 at 31-32. Instead, the commenters requested that the Postal Service move back to its original once-per-year price adjustment schedule, even though one commenter acknowledged that nothing in the modified ratemaking system prohibits multiple price changes in a year. *Id.* at 32.

The Commission reasoned that the Postal Service is currently in compliance with the requirements of 39 U.S.C. § 3622(d)(1)(B) and 39 C.F.R. § 3030.102, as it filed its annual update to the price adjustment schedule on January 11, 2022, stating its intention to "implement price changes for all Market Dominant classes in January and July…with the filings occurring the preceding October and April…."[62] The Commission found that "[n]othing in the statute or regulations dictates the frequency of price adjustments or the timing of when they are to occur." Order No. 6341 at 33. Nevertheless, the Commission encouraged the Postal Service to "work with mailers and other stakeholders to set a schedule for price adjustments that minimizes costs and disruptions to the largest extent possible." *Id.*

---

[61] United States Postal Service Filing of Updated Schedule for Regular and Predictable Rate Adjustments, January 11, 2022, Schedule for Regular and Predictable Rate Adjustments – Effective through Calendar Year 2024, available at *https://www.prc.gov//docs/120/120673/Rate%20Change%20Schedule%20%28FY%202021%20ACR%29.pdf*.

[62] Order No. 6341 at 32-33. *See* United States Postal Service Filing of Updated Schedule for Regular and Predictable Rate Adjustments, January 11, 2022, Schedule for Regular and Predictable Rate Adjustments – Effective through Calendar Year 2024, available at *https://www.prc.gov//docs/120/120673/Rate%20Change%20Schedule%20%28FY%202021%20ACR%29.pdf*.

CHAPTER V. SIZE AND TIMING OF THE AUGUST 2021 RATE INCREASE AND THE IMPACT OF THE COVID-19 PANDEMIC

A. Size and Timing of the August 2021 Rate Increase

House Report 117-79 states that the Committee "is concerned with the size and timing of the [August 2021] rate increase." H.R. Rep. No. 117-79, at 100. As discussed below, the size and timing of the August 2021 rate increase are consistent with the modified ratemaking system, which has been affirmed by the D.C. Circuit.

As an initial matter, the Commission finds that a brief summary of significant events that began with Order No. 5763 establishing the modified ratemaking system[63] clarifies the discussion below:

- November 30, 2020: the Commission issued Order No. 5763 adopting the modified ratemaking system
- January 14, 2021: the modified ratemaking system took effect
- January 24, 2021: the last rate increase under the initial ratemaking system under the PAEA took effect
- April 6, 2021: the Commission determined rate authorities available to the Postal Service under the modified ratemaking system in the next year
- May 28, 2021: the Postal Service filed the first rate case under the modified ratemaking system
- July 1, 2021: House Report 117-79 was issued (this was after the modified ratemaking system had taken effect and after the Postal Service's proposed rate increase had been filed, but before the Commission analyzed and approved the Postal Service's proposal, before the new rates had gone into effect, and before the D.C. Circuit's affirmance of the modified ratemaking system)
- July 19, 2021: the Commission approved the first rate case under the modified ratemaking system

[63] For a more detailed description of these events, see *supra* Section IV.A.

- August 29, 2021: the first rate increase under the modified ratemaking system took effect
- September 15, 2021: the Postal Service filed the Updated Schedule for rate adjustments, stating it would forgo increasing any Market Dominant rates in January 2022 and would instead next increase rates in July 2022, and would adjust rates for Market Dominant products in January and July of each year from then on
- November 12, 2021: the D.C. Circuit affirmed the modified ratemaking system in all aspects
- January 2022: the Postal Service did not implement a rate increase, as stated in its Updated Schedule
- March 9, 2022: the Appropriations Act was passed and the Joint Explanatory Statement was issued (by this time, the D.C. Circuit has upheld the modified ratemaking system and the Postal Service's Market Dominant rates under the modified ratemaking system had been in effect for slightly more than 6 months)
- March 29, 2022: the Commission determined rate authorities available to the Postal Service under the modified ratemaking system in the next year
- April 6, 2022: the Postal Service filed the second rate case under the modified ratemaking system
- May 27, 2022: the Commission approved the second rate case under the modified ratemaking system
- July 10, 2022: the second rate increase under the modified ratemaking system took effect
- October 7, 2022: the Postal Service filed the third rate case under the modified ratemaking system
- November 28, 2022: the Commission approved the third rate case under the modified ratemaking system
- January 22, 2023: the third rate increase under the modified ratemaking system will take effect

In addition, a modified version of Table IV-1, with the addition of the total amount of cumulative rate authority in all three dockets in the last column, appears in Table V-1.

Table V-1
Available Rate Adjustment Authority (By Ratemaking Authority) in Docket Nos. R2021-2, R2022-1, and R2023-1

Ratemaking Authority	Docket No. R2021-2[a]	Docket No. R2022-1[b]	Docket No. R2023-1[c]	Total by Rate Authority Source
CPI-U	1.244%	5.135%	4.200%	10.579%
Density	4.500%	0.583%	0.000%	5.083%
Retirement	1.062%	0.785%	0.000%	1.847%
Subtotal for Compensatory Classes[d]	**6.806%**	**6.503%**	**4.200%**	**17.509%**
Non-Compensatory[e]	2.000%	2.000%	0.000%	4.000%
Total[f]	**8.806%**	**8.503%**	**4.200%**	**21.509%**

[a] Order No. 5937 at 4, Table II-1.
[b] Order No. 6188 at 4, Table II-1.
[c] Order No. 6341 at 5, Table II-1.
[d] The subtotal for compensatory classes includes CPI-U, density, and retirement rate authorities, which are available to all compensatory classes. Compensatory classes include First-Class Mail, USPS Marketing Mail, and Special Services. They account for the vast majority of the Postal Service's volume and revenue. Order No. 5937 at 4, Table II-1; Order No. 6188 at 4, Table II-1; Order No. 6341 at 5, Table II-1.
[e] The 2 percent non-compensatory rate authority is only available for non-compensatory mail classes per fiscal year, not all mail classes. No-compensatory classes include Periodicals and Package Services, which account for only a small amount of the Postal Service's volume and revenue. Order No. 5937 at 4, Table II-1; Order No. 6188 at 4, Table II-1; Order No. 6341 at 5, Table II-1.
[f] This does not include banked, or unused, rate authority.

As Table V-1 shows, most of the August 2021 rate increase was based on density rate authority (4.5 percent out of a total of 6.806 percent for compensatory classes or 8.806 percent for non-compensatory classes). However, this is what the density rate authority is designed to address: the increase in per-unit costs caused by declines in volume per delivery point that is out of the Postal Service's direct control. This is exactly what happened during the COVID-19 pandemic—the mail volume declined significantly and the delivery points increased.[64] This in turn caused a significant, expected, and unavoidable increase in per-unit costs, which is what the density rate authority is designed to address.

The ability of the density rate authority formula to respond to unanticipated changes in mail density, such as the large decline observed in FY 2020 during the global pandemic, is one of the reasons the Commission opted for a targeted formula instead of its originally proposed flat 2 percent supplemental rate authority in the 10-year review. The Commission agreed with the commenters that the flat supplemental rate authority would "not adequately respond to ongoing changes that drive the Postal Service's inability to achieve net income." Order No. 5337 at 62. The sharp density loss in FY 2020 is precisely such a change, and the density rate authority formula responded by increasing the amount of density rate authority.

[64] *See* Order No. 5861 at 3 (finding that Market Dominant volume decreased from 136,898 million in FY 2019 to 122,054 million in FY 2020, total volume decreased from 142,570 million in FY 2019 to 129,184 million in FY 2020, and delivery points increased from 139.96 million in FY 2019 to 141.39 million in FY 2020).

After the pandemic effects on volume appeared to have stabilized in 2021 and 2022, the density rate authority available in Docket No. R2022-1 was only 0.583 percent and was the smallest of all rate authorities granted to the Postal Service in that docket. *See* Table V-1, *supra*.[65] In Docket No. R2023-1, the density rate authority was zero because the Postal Service had already used up its density rate authority in Docket No. R2022-1 following the Commission's determination of that rate authority in Docket No. ACR2021. *See id.*

Instead, total available ratemaking authority began to be mostly driven by CPI-U rate authority in Docket No. R2022-1 (5.135 percent out of a total rate authority of 8.503 percent for non-compensatory classes or 6.503 percent for compensatory classes). *See* Table V-1, *supra.* This is because inflation began to surge in 2021. In Docket No. 2023-1, total available ratemaking authority was entirely driven by CPI-U rate authority (4.2 percent). *See id.* This is because inflation continued to surge in 2022, and the Postal Service had already used up its density, retirement, and non-compensatory rate authorities in Docket No. R2022-1 following the Commission's determination of those rate authorities in Docket No. ACR2021.

This CPI-U-driven trend reflects the surging inflation experienced by the United States in 2021 and 2022.[66] Significantly, the CPI-U rate authority in Docket Nos. R2022-1 and R2023-1 would have been granted under the initial ratemaking system anyway. *See* Order No. 6188 at 22. Once again, the modified ratemaking system is working as intended, addressing loss drivers outside of the Postal Service's direct control (in this instance, a large amount of inflation).

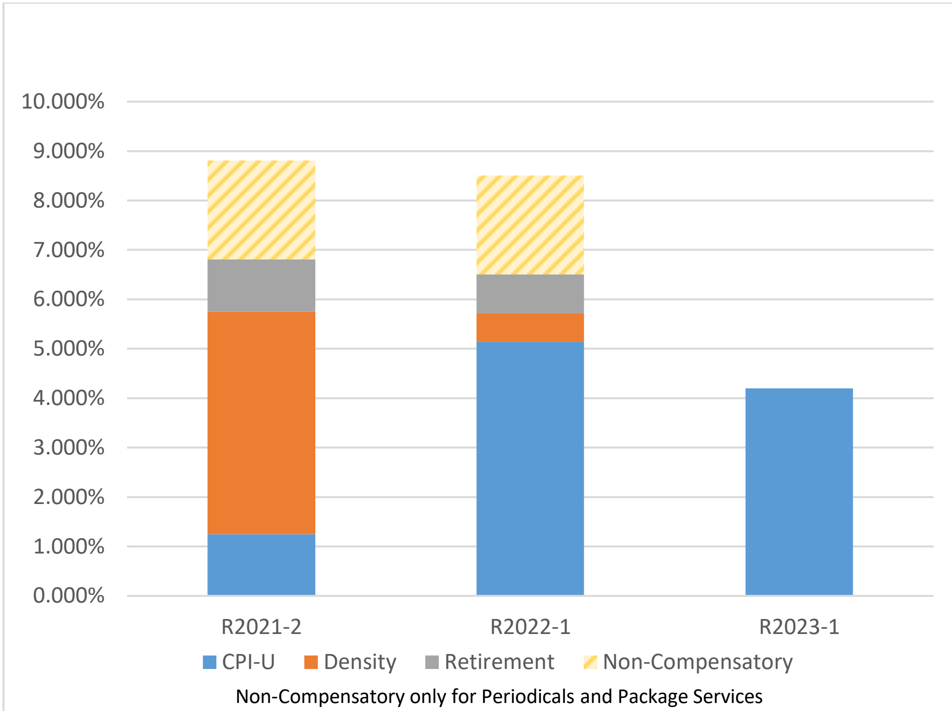
These trends are graphically demonstrated in Figures V-1, V-2, and V-3 below.

---

[65] *See* Order No. 6130 at 4 (finding that Market Dominant volume decreased from 122,054 million in FY 2020 to 121,640 million in FY 2021, total volume decreased from 129,184 million in FY 2020 to 128,895 million in FY 2021, and delivery points increased from 141.39 million in FY 2020 to 143.11 million in FY 2021).

[66] *See* United States Postal Service Office of Inspector General Report, Inflation and the U.S. Postal Service, August 16, 2022, at 3 (stating that the CPI-U "increased by 9.1 percent from June 2021 to June 2022"), 14, Table 3 (showing the CPI-U rate authority compared to the actual change in CPI-U in rate increases from 2008 to 2022).

Figure V-1
Rate Authority by Docket

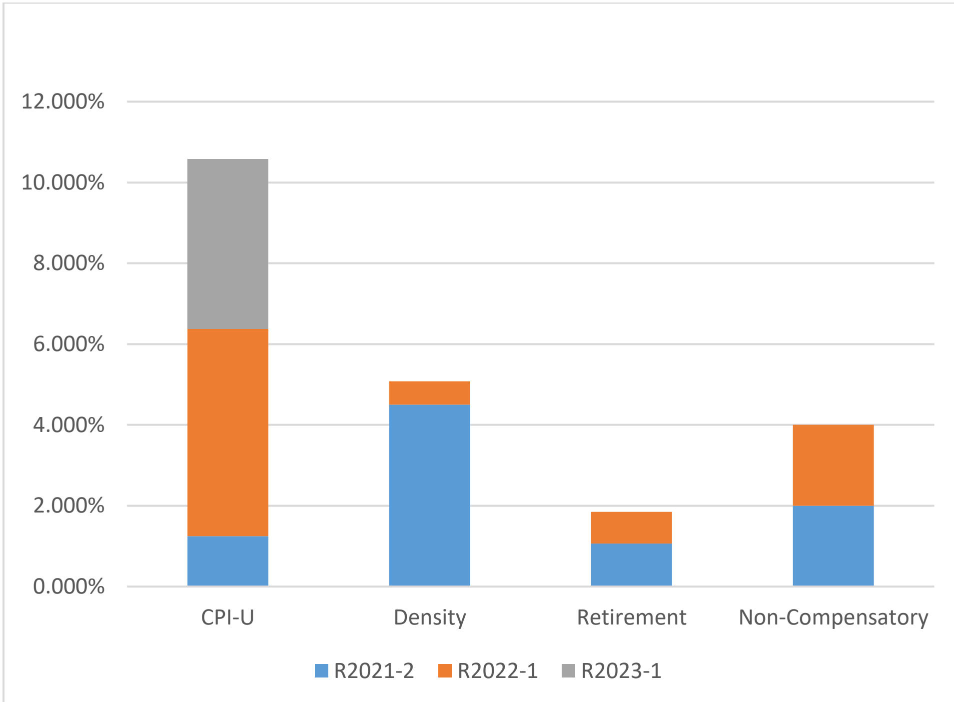


Source: Order No. 5937 at 4, Table II-1; Order No. 6188 at 4, Table II-1; Order No. 6341 at 5, Table II-1.

As shown in Figure V-1, density rate authority accounted for most of the total available rate authority in Docket No. R2021-2, with CPI-U rate authority as the second largest source of rate authority available to every class of mail.[67] In Docket No. R2022-1, density rate authority accounted for only a small portion of total rate authority available to every class of mail, while CPI-U rate authority accounted for the majority. *See id.* In Docket No. R2023-1, all new rate authority derived entirely from the CPI-U rate authority.

[67] Because the non-compensatory rate authority only applies to non-compensatory classes of mail rather than every mail class, the Commission focuses the discussion on the rate authorities that are available to every class of mail: CPI-U, density, and retirement rate authorities. In addition, the Commission does not include banked, or unused, rate authority in its discussion. Rather, the Commission focuses its discussion on newly available rate authorities in each docket.

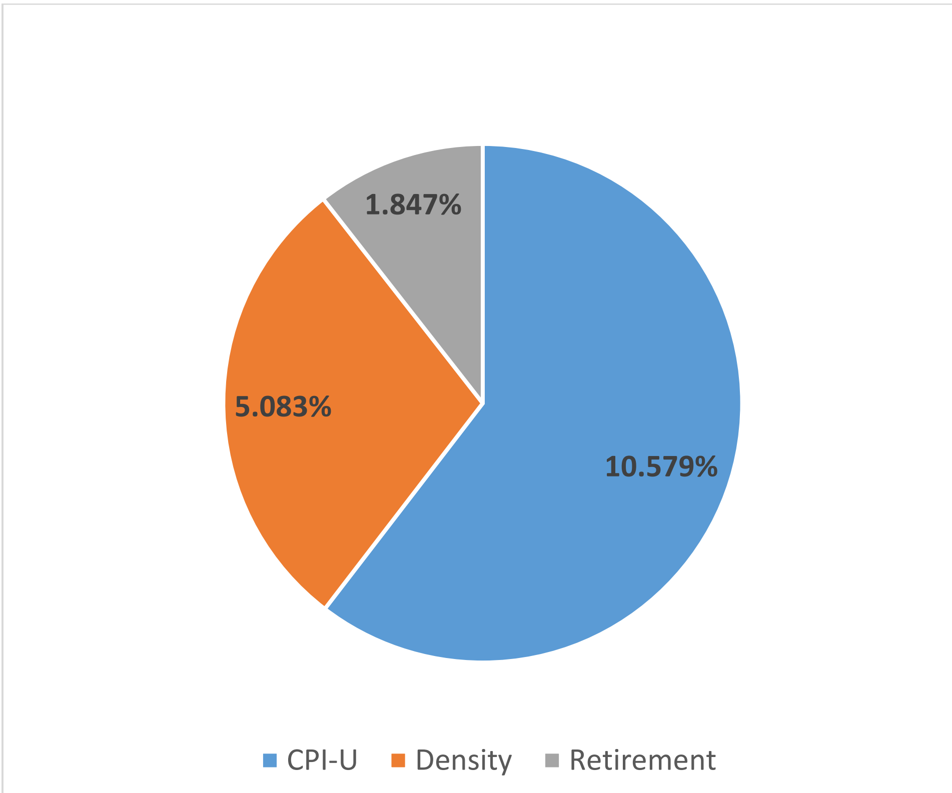
Figure V-2
Rate Authority by Source



Source: Order No. 5937 at 4, Table II-1; Order No. 6188 at 4, Table II-1; Order No. 6341 at 5, Table II-1.

Figure V-2 shows that the CPI-U rate authority was small in Docket No. R2021-2 and much larger in Docket Nos. R2022-1 and R2023-1, reflecting the low inflation the United States experienced in 2020 and the high inflation the United States experienced in 2021 and 2022. In comparison, the density rate authority was a major source in Docket No. R2021-2 and dramatically declined in Docket No. R2022-1, reflecting the significant mail density drop in 2020 and its leveling out in 2021. Retirement rate authority accounted for a small portion of total available rate authority in both Docket No. R2021-2 and Docket No. R2022-1.

Figure V-3
Cumulative Rate Authority Available to Every Market Dominant Class of Mail, FY 2021–Present



Source: Order No. 5937 at 4, Table II-1; Order No. 6188 at 4, Table II-1; Order No. 6341 at 5, Table II-1.

Note: Because the non-compensatory rate authority only applies to non-compensatory classes of mail rather than every mail class, Figure V-3 focuses on the rate authorities that are available to every class of mail: CPI-U, density, and retirement rate authorities. Figure V-3 also does not include banked authority.

Figure V-3 shows the cumulative rate authority for compensatory classes for all three dockets, not including any banked authority. This figure demonstrates that the CPI-U rate authority (10.579 percent) accounts for 60 percent of all rate authorities available to every class in all three rate cases under the modified ratemaking system. All of this CPI-U rate authority would have been available under the initial ratemaking system. The density rate authority (5.083 percent) is only about half the amount of the CPI-U rate authority, or only 29 percent of all rate authorities available to every class in all three rate cases. The retirement rate authority (1.847 percent) is the smallest of all three rate authorities and is designed to be phased out after 5 years. 39 C.F.R. § 3030.181(a).

In summary, considering the significant drop in mail density early in the pandemic, and considering the trends in subsequent rate cases (density rate authority trended down while CPI-U rate authority trended up), the size of the August 2021 rate increase was appropriate and in accordance with the modified ratemaking system.

With regard to the timing of the August 2021 rate increase, the Commission explained that the new requirement in 39 C.F.R. § 3030.102(b) (that the Postal Service file a schedule "annually with the Commission at the time of filing the Postal Service's section 3652 report") was not in effect when it filed its section 3652 report in December 2020, because 39 C.F.R. § 3030.102(b) did not go into effect until January 2021. Order No. 5937 at 48. Similarly, the Commission found that the new requirement in 39 C.F.R. § 3030.102(a)(2) (that the schedule shall "[p]rovide estimated filing and implementation dates (month and year) for future rate adjustments for each class of mail expected over a minimum of the next 3 years") would only come into play when the Postal Service first updates the schedule, which by the rules would happen in late December 2021, several months later than July 2021 when Order No. 5937 was issued.[68] Therefore, the Commission concluded that the timing of the August 2021 rate increase was not inconsistent with the then-existing law. The Commission observed that it was "an unfortunate coincidence that the timing of the finalization of the new rules was such that it relieved the Postal Service of the annual filing requirement of an updated schedule until later [2021]." *Id.*

The Commission notes that House Report 117-79 was issued before the Commission explained why the size and timing of the August 2021 rate increase was not inappropriate in Order No. 5937. Therefore, the Committee did not have the benefit of learning the Commission's reasoning at the time it issued the report.

B. The Commission's Rules and the Rate Proceedings Properly Accounted for the Impact of the COVID-19 Pandemic

The Committee directs the Commission to study "the impact of the pandemic, including factors such as higher package revenues and emergency funding provided to the USPS" on "the rate increases proposed by the USPS and the PRC rules adopted in November [2020]." H.R. Rep. No. 117-79, at 100.

The Commission addressed the impact of the pandemic in Order No. 5763. After considering the mailers' arguments that the Commission was required to reopen the record, the D.C. Circuit affirmed the Commission's reasoning. Notably, House Report 117-79 was issued before the D.C. Circuit affirmed Order No. 5763. Therefore, the Committee

[68] *Id.* at 49. In fact, the Postal Service filed its Updated Schedule in September 2021.

did not have the benefit of the D.C. Circuit's opinion, which considered these same issues and endorsed the Commission's approach.

In Order No. 5763, the Commission determined that "nothing specific to the pandemic undermines the findings the Commission made in Order No. 4257" regarding the failures of the initial ratemaking system. Order No. 5763 at 26. The Commission found that approximately 1 year into the pandemic at the time Order No. 5763 was issued, all the failings it identified with the initial ratemaking system in Order No. 4257 remained applicable.[69]

The Commission acknowledged that the pandemic had led to a shift in the mail volume mix from Market Dominant products to packages (most are classified as Competitive products). *Id.* at 27. However, the Commission rejected the commenters' argument that the density rate authority is flawed because the additional revenue realized from packages had allegedly offset the revenue lost from Market Dominant products. *Id.* at 28. The Commission found that "in terms of per-piece volume, the declines that have occurred with respect to Market Dominant mail far exceed the increases in packages." *Id.* Furthermore, the density rate authority is designed to address the increase in per-unit costs caused by declines in volume per delivery point, and both the declines in volume and the increase in delivery points are exogenous factors outside of the Postal Service's direct control. *See id.* at 27-28. "Regardless of the contribution or revenue associated with packages versus other types of mail, the reality is that—as a result of the pandemic—there are fewer total mailpieces today over which the costs of servicing and maintaining the Postal Service's network can be distributed, which causes the per-unit cost of delivering the remaining mailpieces to increase." *Id.* at 28. It is these costs, which are outside of the Postal Service's direct control, rather than contribution or revenue associated with particular mailpieces, that the density rate authority is designed to address. *Id.* at 29.

The density formula is designed to estimate the expected unavoidable increase in per-unit costs caused by an observed density decline by using the institutional cost ratio as a proxy for the elasticity of unit costs with respect to density. *Id.* at 94-95. Contrary to the mailers' claims, that calculation is sufficient to determine the necessary amount of density rate authority—per-unit revenue is not a necessary input. The increased revenue-per-piece for Competitive products does not affect the cost-per-piece of servicing the Postal Service's network. Per-piece revenue is not included in the density formula because it has no relation to the density-driven increase in per-unit costs.

In addition, the Commission uses the volume input that experiences the lesser decline (either Market Dominant products or total volume) in the density rate authority formula. *Id.* at 344; 39 C.F.R. § 3030.162(b)(2). This properly accounts for the role of Competitive products and benefits Market Dominant ratepayers. Order No. 5763 at 73-74, 99, 344. For example, if Market Dominant volume declines proportionally faster than Competitive

[69] *Id.* at 26-27 (finding that the Postal Service remained financially unstable, and the problems regarding pricing and operational efficiency remained unabated).

product volume (as it happened during the pandemic), the formula input will use total volume rather than Market Dominant volume, which reduces the resulting density rate authority eligible for use for each Market Dominant class. *Id.* at 344. Therefore, by design, healthy Competitive product volume would translate to a direct benefit to Market Dominant ratepayers. *Id.*

With regard to commenters' argument that the additional $10 billion borrowing authority granted by the CARES Act to the Postal Service undermines the Commission's findings on the Postal Service's liquidity, the Commission found the additional borrowing authority "is limited to addressing short-term operating needs due to the COVID-19 emergency" and "cannot be used to address the Postal Service's longer-term financial stability, outstanding debt, and capital expenses." *Id.* at 29-30 (citing CARES Act § 6001(b)). It is "the net losses and accumulated deficits that undermine the Postal Service's medium- and long-term financial stability" that the density rate authority, retirement rate authority, and non-compensatory product/class modifications are designed to address. *Id.* at 30. Therefore, the additional borrowing authority granted by the CARES Act does not impact the Commission's analysis of the Postal Service's liquidity.

Finally, the Commission noted that "it is committed to reviewing the modified ratemaking system in 5 years to assess its performance, and to reviewing specific components of the modified ratemaking system sooner than 5 years if needed." *Id.* at 31. The Commission stated it "will monitor the effects of the final rules on the Postal Service and on mailers in light of economic developments, and it will intervene as necessary if economic conditions prevent the final rules from operating as intended to achieve the objectives of section 3622." *Id.*

In November 2021, the D.C. Circuit affirmed all aspects of the modified ratemaking system adopted in Order No. 5763. *Nat'l Postal Pol'y Council*, 17 F.4th 1184. In particular, the D.C. Circuit held that the Commission adequately supported its decision not to reopen the record to consider evidence that the pandemic caused volume increases in profitable packages, improving the Postal Service's financial condition and making new rate authorities unnecessary. *Id.* at 1196. The court found the Commission reasonably explained that the pandemic did not alter its finding that the existing ratemaking system failed to achieve the statutory objectives, because "[t]he Postal Service's finances remain[ed] unstable" and "the problems identified in Order No. 4257 with respect to pricing and operational efficiency and unreasonable rates [had] not abated." *Id.* (citing Order No. 5763 at 26-27). The Commission found these problems "are expected to persist as long as the existing ratemaking system remains in effect, and nothing specific to the pandemic alters [its] findings with regard to these deficiencies." *Id.* (citing Order No. 5763 at 27).

The Court acknowledged that the Commission's decision was entitled to deference because it depends on "predictive judgments about the likely economic effects of a rule," which are "squarely within the ambit of the Commission's expertise." *Id.* at 1193 (citation omitted). In addition, because section 3622(b) requires the Commission to consider nine objectives, its decision based on "multi-factor balancing test" is also entitled to deference. *Id.* (citation omitted).

The court also noted approvingly that the Commission is committed to "interven[ing] as necessary if economic conditions prevent the final rules from operating as intended to achieve the objectives of section 3622." *Id.* (citing Order No. 5763 at 31).

In Order No. 5937 (the order that approved the August 2021 rate increase), the Commission updated its analysis on the impact of the pandemic and continued to find that pandemic-related factors did not alter its findings in Order No. 5763. The Commission notes that House Report 117-79 was issued before the Commission issued Order No. 5937. Therefore, the Committee did not have the benefit of learning the Commission's reasoning at the time it issued the report.

In particular, in Order No. 5937 the Commission found that the Postal Service's financial condition remained dire. *See* Order No. 5937 at 55-58. Although the pandemic caused large volume increases for Competitive products that generally have higher revenues than Market Dominant products, revenue gains associated with increased Competitive volumes were significantly offset by revenue declines associated with decreased Market Dominant volumes in FY 2020. *Id.* at 55. It found that although the Postal Service's liquidity improved in FY 2020 over FY 2019 largely as a result of the additional $10 billion borrowing authority made available by the CARES Act, its overall financial position remained poor, with an FY 2020 net loss of $9.2 billion and an FY 2020 net deficit of $80.7 billion. *Id.* at 56. Furthermore, the Postal Service's May 2021 Unaudited Financial Report confirmed that the Postal Service remained financially unstable, in that its net loss had been approximately $1.3 billion year-to-date and that its net loss for May 2021 alone was $846 million. *Id.* The month of May alone also shows a reversal in the mail mix trend with Market Dominant volumes increasing 16.9 percent over the same period last year and Competitive volumes decreasing 21.4 percent. *Id.* at 57.

Therefore, the Commission concluded that there was nothing in the information available on the record that would lead it to change its conclusion in Order No. 5763 that the additional ratemaking authorities are necessary for the Postal Service to achieve financial stability, or that the size of the August 2021 rate increase is inconsistent with these additional ratemaking authorities. *Id.* at 58. A 1-year financial improvement in certain limited aspects caused by a global pandemic does not demonstrate the financial health of the Postal Service, nor does it call into question the Commission's conclusion that the initial ratemaking system did not meet the objectives specified in the statute during the PAEA era.

The Commission explained that the statute required the Commission to exercise reasoned, expert judgment to determine which tradeoffs should be made from a holistic view of the system's design. Order No. 5763 at 297. For instance, declining to provide any additional rate authority would further the achievement of Objective 2 somewhat (by generally preventing rates on a class level from exceeding the change in the CPI-U); but would continue to frustrate the achievement of multiple other relevant objectives, including

Objectives 5 and 8. *Id.* On the other hand, resetting all Market Dominant rates to a level that would be sufficient to recover all costs would further the achievement of Objectives 5 and 8 but would likely represent a regression in the progress already made after the enactment of the PAEA toward achieving Objective 2. *Id.* In designing the modified ratemaking system and evaluating the nine statutory objectives in conjunction with each other, the Commission made modifications that in its expert judgment would produce a balanced system. *Id.* at 297-98. The Commission explained how it considered each objective with respect to each new form of rate authority. *See id.* at 303-04, 316-17, 325, 328-29, 338-39, 344, 348-49, 350-51, 353-54, 360 (discussing the consideration of density rate authority with each objective); *id.* at 305, 317-18, 325, 328-29, 344-45, 348-49, 350-51, 354-55, 360 (discussing the consideration of retirement obligation rate authority with each objective); *id.* at 305-06, 318-19, 328-29, 344, 348-49, 350-51, 356-58, 360 (discussing the consideration of non-compensatory rate authority with each objective).

For instance, the Commission rebutted the mailers' arguments regarding Objective 1 that providing the Postal Service additional rate authority would weaken incentives to be more efficient because the Postal Service would cover its costs through rate increases. *Id.* at 298-310. The Commission explained that although a price cap "[t]heoretically" incentivizes the regulated entity to reduce costs and increase efficiency, the PAEA had failed to do so because factors outside of the Postal Service's control had resulted in its costs far exceeding its revenues. *Id.* at 301-02. Therefore, the Commission explained that "providing the Postal Service with the needed pricing tools to narrow the existing formidable gap between revenues and costs" would incentivize the Postal Service "to bridge that gap fully via efficiency gains and cost reductions." *Id.* at 303. Further, the Commission found that the density and retirement obligation rate authorities would not weaken efficiency incentives because they compensate the Postal Service for costs that are "largely outside of its direct control." *Id.* at 303-04. "By closely tailoring the modifications" to the identified deficiencies of the initial ratemaking system, the modified ratemaking system would "provide correct incentives and...encourage prudent pricing and operational decision-making by the Postal Service…." *Id.* at 302.

The Commission found unpersuasive the mailers' arguments regarding Objective 2, that the modified ratemaking system would produce excessive price hikes, explaining that the modified rate system would limit the maximum allowable annual rate increase. *Id.* at 312. It also concluded that "[t]his concern fails to account for the Commission's findings and analysis, which extensively discusses the deficiencies of the existing ratemaking system," namely that it failed to maintain the Postal Service's financial stability and resulted in unreasonably low rates. *Id.* at 313. It further found that the mailers overlooked that the Postal Service has "inherent incentives to exercise business judgment" and not raise rates too sharply. *Id.* at 314. Further, the use of rate formulas would minimize unpredictable price fluctuations and allow for forecasting. *Id.* at 315.

The Commission found that the modified ratemaking system was consistent with Objective 6's goal to increase transparency because the Commission "provided a thorough, publicly available explanation" of the modified rate authorities, "the formula uses inputs from publicly available data and information[,]" and it would "maintain[ ] the underlying calculations on its public website, similar to existing practice." *Id.* at 349 (footnote omitted). Additionally, the Commission concluded that the modified ratemaking system was consistent with Objective 6's goal to reduce administrative burden because "[a]ny additional administrative burden associated with the calculation is minimal and justified by the need to address underlying drivers of the existing system's deficiencies." *Id.*

The Commission rejected the mailers' concern that the modified ratemaking system was inconsistent with Objective 8 and would unjustly enrich the Postal Service as "largely overstated." *Id.* at 352. Providing the Postal Service with additional rate authority was necessary to allow "the Postal Service to set rates that would not threaten its financial integrity." *Id.* The modified ratemaking system would also protect mailers because it "limit[ed] the accrual and use of rate authority to correct particular systemic deficiencies…." *Id.* For instance, the Commission found that the density-based rate authority would not result in excessive rates because it would not be a rate reset, and its formula was designed to produce conservative cost estimates. *Id.* at 353-54. The Commission also found that the modified ratemaking system included "sufficient safeguards" to prevent excessive rate increases. *Id.* at 358.

Therefore, a temporary improvement in the Postal Service's financial condition in limited aspects due to a global pandemic does not obviate the need for achieving the nine objectives of the PAEA applied in conjunction with each other, which the modified ratemaking system was designed to address holistically.

In summary, the Commission has considered the impact of the pandemic, including higher package revenues and emergency funding provided by the CARES Act, on the modified ratemaking system and rate increases. The D.C. Circuit has found the Commission's explanations to be adequate and reasonable. As the Commission has found, nothing specific to the pandemic alters its findings that the initial ratemaking system failed and the modified system is necessary to achieve the statutory objectives.

C. Stakeholder Input

The Joint Explanatory Statement directs the Commission to consult with stakeholders for its report on Market Dominant products. 168 Cong. Rec. at H2356.

On May 26, 2022, the Commission invited stakeholders to provide input on the issues identified by the Committee no later than July 31, 2022.[70] The Commission received 444 timely submissions before the deadline, and 18 late submissions after the deadline. All submissions are included in the Appendix to this Report. The Commission has reviewed all submissions and appreciates the variety of interesting perspectives provided.

[70] PRC Invites Stakeholder Consultation Regarding Study on USPS Rate Increases, May 26, 2022, available at *https://www.prc.gov/sites/default/files/Stakeholder%20input%20for%20appropriations%20act%20study.pdf*.

The vast majority of stakeholders do not provide input on the size and timing of the August 2021 rate increase, or the impact of pandemic-related factors on the rate increases for Market Dominant products, as identified by the Committee. Instead, they:

- Discuss the impact of the PSRA and the elimination of the Postal Service's obligation to prefund RHBs[71]
- Express general discontent with rate increases
- Express discontent with rate increases for Competitive products
- Express discontent with above-inflation rate increases[72]
- Express dissatisfaction with the management of the Postal Service
- Express dissatisfaction with service performance and customer experience
- Request that the Postal Service not be allowed to use the 2 percent rate authority for Periodicals (a non-compensatory class)[73]
- Object to the replacement of the Commission's Office of Consumer Advocate with the Public Representative
- Request that the Commission issue an information request to the Postal Service to obtain answers to certain questions
- State that the density rate authority in general (not the density rate authority used in the August 2021 rate increase in particular) is excessive and sends perverse incentives to the Postal Service, and that the 2 percent rate authority for non-compensatory classes and rate-setting criteria for non-compensatory products in compensatory classes also provide disincentives for the Postal Service to make cost reductions[74]
- State that rate increases are difficult for inmates to absorb and they need special inmate rates for First-Class Mail
- Discuss the impact of rate increases on rural customers
- Request that the rate increases be limited to once per year

[71] The Commission addressed the impact of the PSRA and the elimination of the Postal Service's obligation to prefund RHBs on the retirement rate authority in Order No. 6188. *See* Order No. 6188 at 18. *See also supra* Section IV.C.1.

[72] As discussed above, rate authorities above the inflation cap have been affirmed by the D.C. Circuit. *Nat'l Postal Pol'y Council*, 17 F.4th at 1190-93.

[73] The Commission discussed why the 2 percent rate authority for non-compensatory classes is necessary to achieve the statutory objectives in Order No. 5763. *See* Order No. 5763 at 194-95, 357-58. *See also* Order No. 6188 at 21-25; 39 C.F.R. § 3030.222.

[74] To the extent that this stakeholder's comments encompass any concerns about the density rate authority used in the August 2021 rate increase in particular or the size of the August 2021 rate increase, the Commission finds that the density rate authority and the size of the August 2021 rate increase are appropriate. *See supra* Section V.A. The Commission also explained that the 2 percent rate authority for non-compensatory classes and rate-setting criteria for non-compensatory products in compensatory classes are designed to incrementally address long-standing problems concerning non-compensatory classes and products. *See* Order No. 5763 at 181-83, 189-91, 285.

- Request reduced rates for non-profit organizations
- Request that the Postal Service return to the previous break-even pricing scheme
- Express support for rate increases
- Request that Congress pay off the Postal Service's debts and fund any shortages

All of these topics are outside the scope of this Report, which is focused on the size and timing of the August 2021 rate increase and the impact of pandemic-related factors on the rate increases for Market Dominant products.

Several stakeholders claim that the August 2021 rate increase did not consider the higher package volume and revenue during the pandemic and the additional $10 billion borrowing authority made available to the Postal Service by the CARES Act. This is addressed above in Section V.B. The Postal Service asserts that the pandemic-related factors have already been adequately addressed and that it supports the modified ratemaking system.

Several stakeholders comment on the impact of the rate increases on mailers, *i.e.*, they would be forced to mail less volume or switch to electronic communication entirely due to the rate increases. This was addressed by the Commission in Order No. 5763. *See* Order No. 5763 at 268-70.

CHAPTER VI. CONCLUSION

In conclusion, the size and timing of the August 2021 rate increase were consistent with applicable law and show the modified ratemaking system was working as intended to address specific drivers of the Postal Service's net losses outside of its direct control. Furthermore, the Commission has considered the impact of the pandemic (including higher package revenues and emergency funding provided by the CARES Act) on the modified ratemaking system and rate increases and found it did not alter its findings that the initial ratemaking system failed and the modified system is necessary to achieve the statutory objectives. The D.C. Circuit affirmed that the Commission's explanations for adopting the modified ratemaking system are reasonable. And the U.S. Supreme Court has denied further review of this matter.

The PAEA authorizes the Governors of the Postal Service to exercise reasonable business judgment in setting rates, as guided by the incentives and means provided by the modified ratemaking system, to sustain a viable and vibrant Postal Service. The Commission will continue to monitor the challenges ahead and ensure the Postal Service's successful and lawful implementation of the modified ratemaking system.

Appendix: Stakeholder Input

From:	Hamilton Davison
To:	Stakeholder Input
Subject:	Stakeholder input to PRC per May 26, 2022 invitation
Date:	Sunday, July 31, 2022 2:59:58 PM
Attachments:	Input to PRC July 31 2022- final.pdf

Thank you for the invitation to provide input to the PRC regarding the current round of rate increases and related matters. Please find the attached submission. We are happy to address any questions this raises.

Thank you for your consideration.

Sincerely, Hamilton

--

Hamilton Davison
President & Executive Director
American Catalog Mailers Association
www.catalogmailers.org
Email: hdavison@catalogmailers.org
Direct telephone: 1-401-529-8183

July 31, 2022

Postal Regulatory Commission
Via email to stakeholderinput@prc.gov

Pursuant to the Commission's invitation of May 26, 2022, "PRC Invites Stakeholder Consultation Regarding Study on USPS Rate Increases" (PRC Invite), the American Catalog Mailers Association (ACMA) is pleased to provide these comments. We qualify fully as stakeholders, accounting for a substantial portion of the Postal Service's volume.

Under the umbrella of the rate increase of August 29, 2021 (which Congress notes to have been about 7%, but which averaged just over 8.8% for the key flats categories we use), and in awareness no doubt that the pandemic exacted considerable hardship on mailers and their employees (which may be an understatement), one question Congress asked is whether the rate decision "account[ed] for" the pandemic. PRC Invite. We see no evidence that it did. The $10 billion of "emergency funding provided to the USPS," *Id.*, went selfishly to enhance the Postal Service's cash position, which at the end of FY 2021 was at the level of $27.9 billion (which we view as high). As for rates, which we see as already at levels that bring into question whether mail can survive, mailers were unexpectantly hit on an ASAP basis with the full force of price cap authority calculated with a blind, tortured formula that, as described in our Technical Statement, attached below, did not recognize the nature of the situation extant, the cause of the volume decline, or the profitability of the "higher package revenues" that resulted from the shift of volume toward parcels. *Id.* Neither did the formula recognize the profitability of the new delivery points, which perforce brought volume with them.

To make matters worse, the schedule for rate adjustments now calls for two increases per year, the larger of the two occurring generally in July, though in late August in 2021. An increase just before the fall mailing season, which is the most profitable season for the Postal Service, is bad timing on any score. But when mailers plan, not only mailing quantities but also inventory purchases, employment levels, and printing arrangements, 6-9 months out, not knowing what rate increase to expect is doubly serious. Small rate difference can move mail in or out of the profitable zone, and inventories are a critical investment

The Commission should report all of these matters to Congress.

In our Statement below, ACMA discusses with particularity the Commission's formula for density authority (presented in final form in Order No. 5763, Attachment at 25-26, November 30, 2020, Docket No. RM2017-3) and shows, among several peculiarities and failures, that it did not recognize the shift in volume toward parcels or the profitability of the new delivery points.[1] These are matters that its design was intended to recognize. Also, the rate decision did not defer in any sense to the pandemic but was instead enhanced by it. Perhaps some guidance should have recognized the pandemic, but none did. In fact, ACMA pleaded that the USPS provide relief to mailers in the teeth of the pandemic to keep mailers healthy, quite the opposite of what it did.

Poor management of flats mail threatens to extinguish catalogs, but the loss will be much greater than the volume attrition. Catalogs bring interest in the mail and reinforce the value of mail to consumers. Consumer response from catalogs also begets more catalogs, while generating packages and other types of mail throughout the year. Brands and merchants who use the mail are loyal regular mailers who when properly cultivated, really desire to enter more volume into the system. Sadly, national postal policy has failed this group of loyal patrons. Starting in 2007, the message sent to these companies is that they better prepare to get out of the mail. Actually, Senator Ron Johnson, then chair of the Senate oversight committee, told ACMA representatives exactly this himself.

Mail declines are not a foregone conclusion but a predictable result of poor postal policy decisions. The agency's persistent "go it alone" strategy nearly insures policy and strategic decisions drive mail away. When circumstances require massive change, the USPS's newer and blatantly deliberate method of operating is to circle the wagons and determine what is best for the mailing industry without participant input or consultation. The result is waste, misfires, delays and frustrations across both sides of the spectrum.

The Commission has taken notice of persistent and inordinate cost increases for the flats products we use (which led Congress to request a special study of the matter, Public Law No. 117-108, section 206) and has taken regulatory actions on flats costs over the last decade, but all its additional reporting and activity has led to no substantive improvement. Flats have increased in cost at 2.5x the rate of inflation, compounding, for the last 30 years. Some observers are questioning whether the regulatory system has failed us and needs a complete revamp as our expectation is that the Regulator is in place to prevent excesses by a government-sponsored monopoly. Lately, it seems mailers are getting no such protections.

The system is broken. The results testify to this. The ultimate claimant and the ultimate underwriter is the mailer, who is left holding the bag for poor outcomes. Now is the time to right this ship and set sail on a more prosperous course.

Sincerely,

Hamilton Davison

Hamilton Davison
President & Executive Director

---

[1] New delivery points are a matter of growth. They bring volume with them. We take them as a cause célèbre that should be viewed positively. For our members, they are a source of income.

Attachment: ACMA Technical Statement
Response to Commission Invitation of May 26, 2022
July 31, 2022

I. A LOOK GENERALLY AT THE COMMISSION'S DENSITY-AUTHORITY FORMULA

The Commission states that[1] [2]

> the formula for the density-based rate authority calculates the percentage amount by which per-unit costs *would be* expected to increase as a result of the observed year-over-year change in density.

For the authority calculation that followed the FY 2020 Annual Compliance Review, the one focused on herein, the formula was:

$$Authority = -\%\ \Delta\ in\ density\ from\ 2019\ to\ 2020\ x\ R_{2020},$$

where the % change in density was -10.304% and R_{2020} (the institutional cost ratio for 2020) was 0.4367. By definition, then, 56.33% of the 2020 costs were attributed.[3]

The formula was developed in Appendix A, *Id*., an appendix that is theoretical and complex, and that contains a number of assumptions, approximations, and proxies. Accordingly, an important question is: in practical, operational terms, what does the formula do and what at-issue things does it not do?

By its construction, R_{2020} provides information on the effects of volume changes on 2020 costs; thus it is determining. The percent change in density from 2019 to 2020, a measure that contains no information on changes in volume mix, functions as a driver. *See* "decline of mail density as a specific driver,*"* *Id*. at 72. The functioning of the formula, then, is entirely hypothetical; it is directed at the question—what "would be" the percent change in the 2020 unit cost if 2020 were to experience a density change that,

---

1 Order No. 5763 at 78, italics added.

2 In other places the Commission says it has "identified the *portion* of the increase in per-unit costs caused by the decline in mail density," and in another "the *proportion* of the increase in per-unit costs resulting from the decline in density." *Id*. at 78 and 23, italics added. We do not see that portions or proportions are developed "of the increase" in unit costs. We interpret the formula as intended to aim at a percent increase in unit cost "caused by the decline in mail density."

3 The level of *attributable* cost is a cost-analysis result. The level of *institutional* cost is a residual, total cost minus attributable cost. It is common to express either or both levels as a proportion of, a ratio to, or a percent of, total cost. Therefore, if the institutional ratio is 0.4367, then the attributable ratio is 0.5633 (1 – 0.4367), which is to say that 56.33% of the total cost is attributable.

in percentage terms only, is like the one from 2019 to 2020?[4] The volume mix of the density change imposed is implicitly the mix of 2020. Before discussing aspects of the quantification effort, we clarify several fundamentals:

> (1) R_{2020} is a 2020 manifestation of costing work that began in 1970 and is ongoing. Eight improvements were sanctioned by the Commission in 2020, and five in 2021. 2020 ACD at 9 and 2021 ACD at 10. The volume information contained in R is for a *uniform* volume change for the extant delivery points. "Uniform" herein means the same percent change in each volume category. R_{2020} may be said to *reflect* the 2020 volume mix and the 2020 points, but it contains no information that would facilitate estimating the effects of *changes* in that mix or those points.
>
> (2) If R_{2020} is being multiplied by a density change, which it is, then the effect of the density change is being estimated as though it were a uniform volume change for the 2020 delivery points. This is developed further *infra*.
>
> (3) If the effect of a volume change is being estimated, whether the change is set equal to a density change or to something else, it should be estimated with costs that are variable, not with costs that are attributable; by using R, the authority formula uses *attributable* costs. To keep the discussion simple, we incorporate this inaccuracy.
>
> (4) Since attributable costs are estimated primarily on volume variability, and volume variability is estimated on *small* volume changes, the relevance of R to estimating the effects of volume changes declines as the changes become further from small.
>
> (5) R exists only at the level of overall USPS. This is because no measure or even concept of total cost exists at any lower level of aggregation. This means any calculation of authority at a lower level, like the level of market-dominant products, is seriously defective.[5]

---

4 A less hypothetical question would be: "In going from 2019 to 2020, a density change occurred; in percentage terms, what effect did that change have on the 2019 unit costs?" The Commission did not ask that question.

5 It can be reasoned that an R exists for a cost segment, but not for a product or a group of products. For example, consider a transportation cost segment. A percent change in transportation cost per a 1% change in volume would give a variability percent. The institutional ratio (fixed-cost percent) of the segment would be 1 minus the variability percent. But a product is different—unless it uses the entirety of all of its cost segments and does not benefit, even in a non-variability sense, from the presence of other segments, an R does not exist for it. One could think in terms of having a stand-alone cost and productive system for each product. Then each product would have an R. Then one could imagine a total cost and an attributable cost for each product, both below the stand-alone levels.

II. A LOOK AT THE DETERMINANTS OF DENSITY

Consider the determinants of density (D). By definition

$$D = \frac{V}{N} = V\ x\ N^{-1}, \text{ where N = the number of delivery points.}$$

Taking a total derivative, we get

$$dD = \frac{\partial D}{V}\ dV + \frac{\partial D}{N}\ dN = N^{-1}\ dV - V\ N^{-2} dN.$$

The percent change in density is $\frac{dD}{D}$. Thus

$$\%\ \Delta\ in\ density = \frac{N^{-1}\ dV}{\frac{V}{N}} - \frac{V\ N^{-2}\ dN}{\frac{V}{N}} = \frac{dV}{V} - \frac{dN}{N}.$$

For small changes, then, and for somewhat larger changes approximately, the percent change in density is simply equal to the percent change in volume minus the percent change in the number of delivery points.[6] This means that the effect on density of an x-percentage-point decline in volume is the same as the effect of an x-percentage-point increase in the number of delivery points.

Further, the authority formula can be written as

$$Authority = -(\%\ \Delta\ in\ volume\ x\ R_{2020} - \%\ \Delta\ in\ delivery\ points\ x\ R_{2020}).$$

This shows, for example, that the effect on unit cost and authority, like the effect on density, of a 1% decline in volume is the same as the effect of a 1% increase in delivery points, and similarly that the effect of a 2% decline in volume paired with a 0% increase in points is the same as the effect of a 1% decline in volume paired with a 1% increase in points. These equivalencies are untenable. Another way to look at this is to say that density is a wayward driver of costs, certainly not useful here.

This is a serious problem. Density is the additive sum of two things that are quite different, and one would not expect changes in them to have the same effect on costs. Either the maintained hypothesis underlying the authority formula's specification is invalid or the steps that led to it do not represent reality. The formula cannot be expected to give meaningful results.

---

[6] Going from 2019 to 2020, the change in volume was -9.389% and the change in points was +1.021%, suggesting a % Δ in density of -10.410%. The actual % Δ in density was -10.304%. The two are slightly different because the change in volume deviated a little from "small."

III. THE INTERPLAY BETWEEN VOLUME AND DELIVERY POINTS

The results of Section II were based on two partial derivatives, (1) D with respect to V and (2) D with respect to N. But as a practical matter, it is not possible to change N without changing V *pari passu*. That is, new delivery points bring new volume.

In fact, it seems likely that new points tend to receive and send more volume than vintage points,[7] as new households, new families, and new businesses usually need to correspond and usually are targeted. Further, new points might well have lower costs than vintage points, as new points might be served by cluster boxes, be interspersed among existing points, and be apartments or condominiums with mail rooms. By any measure, new points should increase efficiency and enhance profitability. The Postal Service should certainly be happy to have them.[8] And it probably helps that urban areas are growing faster than rural areas.

In 2019 the volume was 142,570 (in millions) and in 2020 was 129,184. In 2020, there were 139.9 vintage stops and 1.43 new stops. *If the new stops received the same per-stop volume as the vintage stops*, it follows that the vintage stops received 127,879 pieces and the new stops 1,305 pieces. Using these figures, the volume to the vintage stops declined 10.304%. This 10.304% is exactly the decline in density.

So, under a reasonable assumption, the percent change in density is nothing more than a way of measuring the percent change in volume to the vintage stops. It is not rich or unique in causal properties.

IV. A DEVELOPMENT OF THE COMMISSION'S FORMULA MAKES CLEAR WHAT IT DOES

Normally, estimating the effect of a change that occurred to 2019, as it morphed into 2020, would be done by imposing the change on 2019 and taking the difference (2019 with the change minus 2019 as reported). Instead, the Commission's formula imposes the change on 2020, which already reflects the change, and reflects as well a range of other cost-causing factors, including inflation.

Section II established that the percent change in density is the percent change in volume minus the percent change in delivery points. This was shown to suggest major

---

[7] In a specific year, "vintage" delivery points refers to points that also existed in the previous year; they are not new points.

[8] Increases in the number of delivery points have been in the neighborhood of 1% per year. But to see the effect, suppose the number of points doubled. The Postal Service would spring into the black and be faced with the need to reduce rates. To be discouraged by new delivery points is to be discouraged by the advent of growth, something normally viewed as inherently good.

difficulties with the authority formula. Section III explained that new delivery points would bring volume with them and that the new volume would, in all likelihood, be quite profitable. It also showed that the percent change in density is a measure of the percent change in volume to the vintage points. We now ask how the density formula should be viewed.

As a simple point of reference, consider how the effects of volume changes have been estimated in postal analyses, and assume (wrongly, but as the Commission's formula does) that attributable costs are variable.

Let TC = total cost, ATT = attributable cost, FC = fixed cost (interchangeably called institutional cost), and UC = unit cost. When a uniform volume change occurs for the extant delivery points, the attributable cost changes in proportion to volume and the fixed cost remains relatively unchanged, at least for small changes. Let subscript 1 be a base position, like 2020, and subscript 2 be after a hypothetical volume change. In the base position, we know by definition:

$TC_1 = ATT_1 + FC_1$

$FC_1 = R \text{ x } TC_1$

$ATT_1 = (1 - R)\ x\ TC_1$

$UC_1 = TC_1 / V_1 = \frac{ATT_1 + FC_1}{V_1}$

The Commission explains that it wants "the percentage amount by which per-unit costs would be expected to increase as a result of the observed year-over-year [decrease] in density." *Id.*, "change" changed to "decrease." For 2020, we take this to mean a decrease *like* the one from 2019 to 2020, which involved a decline in volume, an increase in delivery points, and a change in volume mix. As shown above, the *percent* change in density, which is all that is entered into the formula, is a measure of the change in volume for 2020's vintage points. Instead, let's apply the percent change in density as though it were a uniform volume change to all of 2020's points. Let z = the % change in volume, so z = -0.1 means a 10% decline in volume.

By virtue of the characteristics built into the costing results, we can say:

$$UC_2 = \frac{(1+z)Att_1 + FC_1}{(1+z)V_1}$$

The % change in UC = $\frac{UC_2 - UC_1}{UC_1} = \frac{\frac{(1+z)ATT_1 + FC_1}{(1+z)V_1} - \frac{ATT_1 + FC_1}{V_1}}{\frac{ATT_1 + FC_1}{V_1}}$

Substituting R for $\frac{FC_1}{TC_1}$, and reducing, we get

$$\%\ \Delta\ in\ UC = \frac{-z}{(1+z)}\ x\ R,\ which,\ for\ small\ values\ of\ z,\ = -z\ x\ R.$$

This is exactly the Commission's formula, which establishes that the Commission holds the fixed costs constant and applies the 2019-2020 percent change in density to 2020 as though it were a uniform percent change in volume to all of 2020's delivery points. This is hardly what the Commission set out to do. It analyzes the mix of 2020 instead of the change in mix that occurred after 2019; it definitely holds the fixed costs constant; it imposes a volume change larger than the one that actually occurred; and it does not recognize any new delivery points or the profitability of the volume going to them. The formula is not applicable.

It is true that "fixed costs" are often held fixed, though that may be somewhat out of line with the interest here. Generically, fixed costs are not a pool of costs (identifiable or not) that are fixed. Rather, they are a residual. In going from one position to another, the Postal Service should, and likely does, control its total cost as best it can, find a new attributable cost, and then subtract to get a new residual. Assuming the previous residual to remain unchanged fails to recognize any success in controlling total cost, a failure that is a weakness here. Any decline in fixed cost causes the formula to overestimate the percent increase in unit cost and to fund what does not need to be funded.

Comments in Docket No. RM2017-3 asked about the recognition of mix. The Commission's response was that the level of R, here for 2020, obviously *reflecting* any mix change from 2019, is different from what it would have been without the mix change, and thus that the result of the hypothetical volume change, of 2020 mix, imposed on 2020, will give a different authority than without the mix change. *See Id*. at 94-95.

The mechanism envisioned by the Commission is that, for example, if the 2019 mix shifts toward products with relatively high per-piece margins, such as parcels, which would improve profitability beyond what would be expected from the decline in volume, a lower R in 2020 would recognize it and the formula would generate less authority. It explains that the "cost elasticities of each cost segment" are "captured" and "are in turn indirectly captured by the institutional cost ratio." *Id.*

It is true that a calculable R exists for each cost segment. That is, there is a percent attributable for each segment, and the percent fixed, which is R, is one minus the percent attributable. Let α_i equal the percent fixed for segment i. Segment i also has a cost proportion, β_i, which is the total cost of it divided by the total cost of the Postal Service. It is relatively easy to show that $R_{overall} = \frac{1}{TC}\ x\ \sum(\alpha_i\ x\ \beta_i)$. And we know $\sum \beta_i = 1$, so that when a β increases, one or more others must decrease.

In the authority formula, the hypothetical volume change, taken to be equal in percent terms to the percent change in density, is a *piece*-oriented measure. Its value, then, is not affected by pieces shifting. The only other variable is R_{2020}. For it to be affected downwardly, to give lower authority due to mix, requires the higher-per-piece-margin products to have lower α values. We know of no evidence that this is a phenomenon, nor would we expect there to be any. Certainly it would need to be proven before it could be relied on, and the Commission has not done that. Until proven otherwise, we believe the effect of a mix change is not recognized.

An alternative to having the α values correlated negatively with the per-piece margins is to have the β values vary similarly. But increasing a β value simply moves the sum in the direction of the associated α value, so the problem reverts to the α values and does not go away.

Limited evidence can be brought to bear on these conclusions, limited because many factors beyond volume affect costs. In 2010, 0.84% of the volume was competitive. In 2020 it was 5.52%, a proportion that is 6.57 times as high. Over the same period, the unit cost increased 44.3%, from 44.2 cents to 63.8 cents. So far as we know, a weighted unit cost index for the overall Postal Service is not available, but we believe a large part of this increase is due to volume increases for the competitive products, and we believe the revenues increased right along with the volume. The associated institutional ratio went from 45.0% to 43.8%.

It seems apparent that Congress asked about mix because products with higher per-piece margins, like parcels, might lead to higher profits, lessening the need for a rate increase. This suggests another problem—there is nothing in the authority formula to recognize what happens to profits. For example, a high-margin parcel would count as one piece in the density calculation, but add substantially to revenue.

In response to this question, the Commission explains that "factoring in revenue (or contribution) would not comport with the *necessity* of compensating the Postal Service for unavoidable increases in per-unit costs," and further that "calculating the density-based authority as a particular revenue or contribution level would inadvisably tie the amount of authority to the Postal Service's pricing decisions." *Id.* at 95, italics added, paren in original.

When a change in mix causes a significant increase in revenue, as high-margin parcels would, it is far from clear, indeed it is confounding, that there should be a "necessity of compensating the Postal Service." Generally, firms are quite happy with cost increases that are accompanied by even-larger revenue increases, increases that are neglected entirely here. Although we do not advocate an attempt to maintain a certain profit level, we see it as no more difficult to estimate the effect of a volume change on profit, *ceteris paribus*, than to estimate the effect of a volume change on cost, *ceteris paribus*.

The Commission uses R as a "proxy for the elasticity of unit costs with respect to density." *Id*. at 94-95, footnote omitted. Using the result above and the result of the last section, an expression for this elasticity is:

$$Elasticity = \frac{\%\,\Delta\,UC}{\%\,\Delta\,D} = \frac{\frac{-z}{(1+z)}\ x\ R.}{\frac{dV}{V} - \frac{dN}{N}}$$

The numerator is good only if dN=0. With dN=0 in the denominator as well, and recalling that z = dV / V, the elasticity reduces to -R for the case of a small z. The purpose of the entire analysis, however, is to work with the case where dN is not equal to zero. Thus the proxy fails the most in the case where it is needed the most. It is much closer to being an elasticity with respect to volume than density.

The conclusion is that the Commission's formula, if R and the percent change in volume are for the same year, as they are, is a proper one for estimating in that year the percent change in unit costs that would be caused by a hypothetical, uniform percent change in volume for that year's delivery points, if the fixed costs remain unchanged. But if the change in density is applied as though it were a volume change to all delivery points, as it is, then it overestimates the effect of the volume change and fails to recognize the profitability of any change in mix or the profitability of any new delivery points. Therefore it overestimates the authority result.

V. THE LINK OF UNIT COSTS TO PROFITS IS FRACTIOUS AT BEST

The Commission views density as one of the drivers of unit cost; we have shown it to be a poor one, to the point of being unacceptable. The Commission views unit cost as a "driver of the Postal Service's net losses," likely meaning of the Postal Service's net income or profit. *Id*. at 86-87, *see also* 99. On examination, however, unit cost hardly qualifies to be a driver of profit—the relation of it to profit is anything but orderly.

Let π = profit and P = price. By definition π = TR – TC. We can express π as

$$\pi = \frac{TR}{V}\ x\ V - \frac{TC}{V}\ x\ V.$$

We know that $\frac{TR}{V} = P\ and\ \ \frac{TC}{V} = UC.$

Thus $\pi = P\ x\ V - UC\ x\ V.$

In delta form $\Delta\pi = \frac{\partial\pi}{\partial P}\ \Delta P + \frac{\partial\pi}{V}\ \Delta V.$

This can be developed using the chain rule for UC *x* V. If ΔP = 0, we get

$$\Delta\pi = (P - UC)\ x\ \Delta V - V\ x\ \Delta UC.$$

P - UC = the per-piece contribution. It follows that

$$\Delta\pi = (per\ piece\ contribution)\ x\ \Delta V - V\ x\ \Delta UC.$$

Therefore, if a change in unit cost is caused by a change in volume, as it is in the authority formula, it does not reach profit until it is multiplied by –V and then added to the per-piece contribution times ΔV. Thus, unit cost is not an unalloyed driver of changes in profit. At best it is a complex driver that is difficult to understand.[9] One could say that it is more endogenous than exogenous, which appears to make it useless.

The Commission's formula estimates the percent effect on the 2020 unit costs (which are the unit costs that existed for the actual 2020 volume, new delivery points and all) of a hypothetical 2020-mix volume decline of 10.304%. This is larger than the actual volume decline. Even neglecting the mix question and the question of whether the fixed cost is really fixed, this has nothing to do with the effect of any new delivery points, which would be expected to be profitable, in all likelihood more profitable than the vintage points. The formula neglects the new points, their volume, and their revenue. For these reasons, the formula is an overestimate of any burden placed on the Postal Service from the density change. Since the object of the density analysis was to recognize the effect of volume and new stops, the formula is fatally flawed. Some justification is needed before the formula can be used.

VI. THE DENSITY APPROACH DOES NOT DEAL WITH CYCLES

The Commission's authority scheme, which does not force rate declines, does not deal fairly or in a balanced way with cycles. Generically, a cycle occurs when something increases and then decreases, or decreases and then increases, or simply has a trend that fluctuates. Beyond the possibility of cycles in the economy, the Postal Service can have cycles of its own. For example: An election might cause a volume increase in one year, only to come down the next. A pandemic or epidemic can cause volume to decline, only to increase later. Decisions relating to mail-in voting can have more effect in one year than another. Government programs can have a fluctuating effect. Fluctuating exchange rates can affect various sectors of the economy. A war or a recession could cause big changes. If the volume declines, authority is given and the rates increase. If the volume then increases, returning all that was lost on the downturn,[10] the authority formulas can be calculated but the Commission's rules say that a rate decrease is not required. The new rates stay in forever, even if no longer needed. Then if the volume declines again, the rates increase more, building on themselves.

---

[9] The Commission states, correctly we believe, that "most cost drivers are correlated with volume." *Id.*, Appendix A at 5. It is not clear that profit is correlated in a helpful way with unit cost. In fact, the correlation seems unhelpful in extreme degree.

[10] An interesting question is whether belt-tightening during a downturn might allow a tighter belt when the volume returns.

VII. CONGRESS ASKED ABOUT HOW IT'S $10 BILLION PROVISION WAS RECOGNIZED

Noting the "approximately 7 percent" rate increase that was implemented on August 29, 2021, Congress asked whether the "emergency funding provided to the USPS" was accounted for. The funding, $10 billion, was a provision of the CARES Act, passed March 27, 2020. According to the FY 2021 Integrated Financial Plan (IFP), filed with the Commission on November 24, 2020, the Postal Service reached an agreement in principle with the U.S. Treasure on July 29, 2020. The only step remaining was to memorialize the agreement in documents.

On December 30, 2020, in Order No. 5763, the Commission made a final determination of the formula to be used for the rate authority. On December 31, 2020, the Postal Service filed its version of the authority it would receive for the August 29 increase. Since the formula was clear and the inputs to it were not subject to debate, there was every reason to believe that the Commission would agree. It did just that on April 6, 2021, in Order No. 5861.

So when the Postal Service was planning the rate adjustment, and when the Commission was issuing the formal version, the $10 billion dollars from Congress was understood. In response to Question No. 2 in CHIR No. 24, Docket No. ACR2021, the Postal Service indicated that it spent $8.7 million of the funds on compensation and benefits and $1.3 billion on transportation. These did not affect the USPS net income, however, because they did not affect the level of revenues or costs. The 2021 IFP reported theoretical unrestricted liquidity of $15.4 billion, and the 2022 IFP reported $27.9 billion. Most of the increase was allowed by the $10 billion from Congress.

The USPS net income for 2020 was $-9.2 billion and per the 2021 IFP was planned to be $-9.7 billion in 2021. So the grant by Congress did not affect these. The question facing the Postal Service, if not the Commission, was whether the $10 billion was intended to go directly to USPS liquidity or whether it was also intended to help mailers as well, who were also affected by the pandemic.

If the 7% increase is applied to the 2020 market-dominant revenue of $41.8 billion, the result is about $2.9 billion. This is less than a third of the $10 billion. This may be a judgment call, but it would certainly seem reasonable to use $2 billion or so of the $10 billion to reduce the August 29 rate increase.

From:	Michael Plunkett
To:	Stakeholder Input
Subject:	Comments Regarding Study on USPS Rate Increases
Date:	Sunday, July 31, 2022 1:38:19 PM
Attachments:	PostCom reponse to PRC solicitation of comments on ratemaking.pdf

Attached for your consideration, please find comments on behalf of the Association for Postal Commerce regarding the required study on USPS rate increases. Any questions regarding the attached document can be addressed as indicated below.

Regards,

Michael Plunkett
President & CEO
Association for Postal Commerce
michaelplunkett@postcom.org
O: 703-524-0096
M: 703-268-3837

PostCom
Association For Postal Commerce

Delivering Postal Advocacy,
Resources and Results

July 31, 2022
Postal Regulatory Commission
901 New York Ave. NW., Suite 200
Washington DC 20268

Postal Regulatory Commission,

As adopted by the Joint Explanatory Statement accompanying the Consolidated Appropriations Act, 2022, the House of Representatives Report 117-79 states:

> The Postal Accountability and Enhancement Act of 2006 (PAEA) required the PRC to review the existing Market Dominant rate and classification system 10 years after the enactment of the PAEA. Based on this review, the PRC adopted rules in November 2020 providing greater pricing flexibility to the United States Postal Service (USPS). USPS has used this expanded authority to propose increasing certain postal rates effective August 20, 2021, by approximately 7 percent. The Committee is concerned with the size and timing of the rate increase and that the PAEA process did not account for the impact of the pandemic, including factors such as higher package revenues and emergency funding provided to the USPS. The PRC is directed to study these factors and report to the Committee within 270 days on how these factors should impact the rate increases proposed by the USPS and the PRC rules adopted in November.

The concerns of the Committee are well founded. Indeed, the fact that the House has taken the highly unusual step of "directing" the Commission to "report" on its November Rules at a specified date strongly suggests that unless the PRC has a compelling rationale for repealing the price cap outright, Congress has concluded that the Commission should initiate a proceeding to re-consider that action immediately. Certainly, the passage of the Postal Reform Act removes what little basis there was for the Commission's decision.

As PostCom and others noted in RM2017-3, the paper losses suffered by the Postal Service after the enactment of PAEA were the result of an onerous prefunding requirement, and thus required a legislative solution. Instead, the Commission endowed the Postal Service with additional rate authority despite the fact that Postal Revenues had been growing, thanks in part to tremendous growth in the Postal Service's package business.

That growth in the Postal Service's competitive product revenue, which was documented by PostCom and other participants in RM2017-3, has accelerated during the COVID-19 pandemic, as eCommerce shipments have expanded rapidly. From 2019-2021, revenues from the Postal Service's shipping business increased from $22.7 billion to $32 billion.

This has produced a remarkable reversal of the Postal Service's financial fortunes. In the Delivering for America Plan, the Postal Service projected revenue of $71 billion and a net loss of $9.4 billion for the 2021 fiscal year. In fact, FY2021 revenues exceeded $77 billion, and the postal service recorded a net loss of only $2.4 billion.

The Postal Service's performance was even better than reported. While the Postal Service's revenues were increasing substantially, the CARES Act provided $10 billion to offset costs incurred during the pandemic. If that $10 billion had been reported as revenue – and the costs identified as requiring offset were recorded as operating expenses – the Postal Service would have reported a net *income* of $7.6 billion. It should be noted that the FY2021 revenue numbers reflect less than three months of the 2021 rate increase revenues, and that postal revenues will be further augmented by the rate increase which took effect this month.

The Commission must also consider the significant improvement to the Postal Service's balance sheet arising from the enactment of the Postal Service Reform Act of 2022, which provided a $59 billion reduction in the Postal Service's retiree health benefits liability; the primary concern cited by the Commission as necessitating greater rate authority.

We are less than two years out from the implementation of the Commission's new regulations. During that relatively short period of time, the Postal Service has already enacted multiple reductions in planned service quality and doubled the frequency of its rate increases.

Over the eighteen months from January 2021 through July 2022, users of some of the Postal Service's flats products have experienced rate increases exceeding 30 percent as the Postal Service's revenues have reached unprecedented levels. The most recent rate increase is further evidence that the Postal Service will maximize utilization of any rate authority available irrespective of the impact on customers or of changes in its financial condition.

PostCom has already petitioned the Commission to initiate a rulemaking to consider the need to revise the current system of rate regulation. The Committee's concerns reinforce PostCom's position that the existing regulations are in immediate need of reconsideration, and we urge the Commission to commence the proposed rulemaking immediately. The significant reduction in the Postal Service's paper losses resulting from the Postal Reform Act, and the additional savings the Act will create going forward, have vitiated the basis for the Commission's rules. While the Commission cannot be faulted for failing to anticipate the passage of the Postal Reform Act of 2022, its refusal in the face of a Congressional directive to reconsider its earlier decision would be a grave injustice requiring legislative remedy.

Sincerely,

Michael Plunkett
President & CEO, Association for Postal Commerce

From:	Deborah Johnson
To:	Stakeholder Input
Subject:	Comment on Recent Rate Increases
Date:	Saturday, July 30, 2022 5:06:43 PM
Attachments:	PRC Letter July 2022.pdf

Good afternoon,

Please find attached my organization's letter regarding the Postal Regulatory Commission's authorization of above-inflation postage price increases. Thank you for your time and attention to this very important matter.

Sincerely,
Deborah Johnson

Deborah Johnson
Director of Marketing
National Committee to Preserve
Social Security and Medicare
111 K Street, NE, Suite 700
Washington, DC 20002-8110
Phone: 202-216-8452
Fax: 202-787-3739

National Committee to Preserve
Social Security & Medicare®
Trusted • Independent • Effective

July 29, 2022

Commissioner Michael M. Kubayanda, Chairman
Commissioner Ann C. Fisher, Vice Chairman
Commissioner Mark Acton
Commissioner Ashley E. Poling
Commissioner Robert G. Taub
Postal Regulatory Commission
901 New York Avenue, NW
Suite 200
Washington, DC 20268

RE: Docket No. RM2022-5

Dear Commissioners,

On behalf of the National Committee to Preserve Social Security and Medicare and our more than one million members and supporters, we are writing to urge you to reconsider your authorization of above-inflation postage price increases. These continual increases have a <u>detrimental</u> impact on the National Committee's fundraising efforts, forcing us to drastically reduce mail volume. This will have a devastating impact on our revenue and our mission.

As a nonprofit advocacy and membership organization, we count on the Postal Service to help us communicate with our donors and receive support for our mission at the Marketing Mail rate. Our mission is to protect, promote and ensure a healthy, productive, and secure retirement for current and future generations of Americans. Founded 37 years ago by President Franklin D. Roosevelt's son James Roosevelt, the National Committee has been the most aggressive defender of Social Security and Medicare programs which are vital to keeping millions of seniors out of poverty. We provide educational information to the public and to our members as well as engage both in advocacy campaigns.

The postage increases outlined in the recent proposal will have a massive impact on our mission and the people we serve. Our educational, fundraising, and advocacy programs will be reduced and our ability to serve our members and to advocate on their behalf will be severely diminished. This is due to the reduction in our ability to advocate before Congress to prevent cuts to Social Security and Medicare, to advocate for desperately needed expansions of these programs, and to provide them with educational information that allows them to follow the ebb and flow of policy discussions of vital interest to them.

Direct mail is our main source of revenue, and it is vital to fulfilling our mission. As large-volume mailers, we mail approximately 20.5 million pieces annually. In the last 12 months, the National

Committee spent more than $4.35 million on outgoing postage (primarily at the flat rate) and generated over $437 thousand in first-class return postage. Our postage costs are up 2.5 to 7.75 percent depending on the package format and mail volume. Postage makes up 32 percent of our program costs and is having a significant impact on what we choose to mail, especially in acquisition. Due to the increased costs in paper as well, we have made the decision to mail more letter-rate formats instead of the larger inline formats and to cancel some mailings. This does impact our returns, but due to steep increases year-over-year, we must consider the impact on the organization's expenditures as well. Fulfilling our mission and representing the interests of our engaged members and supporters is critically dependent on our ability to operate and communicate efficiently in a cost-effective way.

Additionally, we also urge you to respond positively to the petition filed by the Alliance of Nonprofit Mailers on April 11, 2022 (Docket RM2022-5). This petition urges you to revisit regulations authorizing above-CPI rate increases.

The National Committee continues to do everything we can to keep costs at a minimum and will not be able to increase our budget to offset these postage increases. Any expense, such as postage, that drastically exceeds our means will result in necessary reductions in our use of mail. Such a reduction will lead to loss of revenue, limiting our reach and reducing the amount our organization can spend on critical advocacy efforts on behalf of America's seniors and their families.

I appreciate your review of these concerns and urge you to reconsider your authorization of above-inflation postage price increases.

Very Respectfully,

Max Richtman

Max Richtman
President and CEO

Christine Kim

Christine Kim
Chief Financial Officer

Deborah Johnson

Deborah Johnson
Director of Marketing

From:	Kathleen Siviter
To:	Stakeholder Input
Cc:	Bob Galaher
Subject:	Stakeholder Input on USPS Rate Increases
Date:	Saturday, July 30, 2022 2:00:10 PM
Attachments:	NAPM_Comments on PRC Study on USPS Rates 7-31-22.pdf

Attached please find comments of the National Association of Presort Mailers (NAPM) in response to the PRC's May 26, 2022, invitation to stakeholders to provide input on the issues identified in Congressional Report language. Please contact us if you have any questions or need additional information.

Kathleen Siviter
Assistant Executive Director

Tel: 571-275-8270
Email: kathleen.siviter@presortmailer.org
Web: www.presortmailer.org

National Association of Presort Mailers
PO Box 3552
Annapolis, MD 21403

Helping influence postal policy and protecting the workshare program for our members since 1984.

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

PRC STUDY ON USPS RATE INCREASES

COMMENTS OF THE
NATIONAL ASSOCIATION OF PRESORT MAILERS
(July 31, 2022)

The National Association of Presort Mailers (NAPM) respectfully submits these comments in response to the Postal Regulatory Commission (PRC) May 26, 2022, invitation for stakeholders to provide input on the issues identified by the House of Representatives Report 117-79.

NAPM's members include businesses that manufacture mail and/or provide services related to mail for business customers electing to use mail for their communication needs. Our members also offer businesses services related to parcels, and our members have diversified over the years so that today they provide a long and growing list of communication, transaction and shipping services to the business community. Our membership also includes mailing supply chain vendors and solutions providers, as well as mail "owners" (end-user businesses).

Our mail service provider members act as the "facilitators" that enable businesses to use the USPS' products and services easier and cheaper with better customer experience and USPS service performance. Our members provide "total solution capabilities," from printing, packaging, addressing, integrating omni-channel solutions, tracking, and more to enable the mail user to attain the greatest value mail offers them for their communications, business transactions, integrated marketing, and eCommerce business needs. Our members produce the most cost effective, efficient, and profitable mail for the USPS by commingling mail from multiple business customers into streamlined IMb Full-Service or Seamless mailings that help reduce the USPS' costs, provide them with extensive mail data to support a host of USPS programs and services, and more. Our members interact and provide services for tens of thousands of businesses across the United States.

Our comments included herein focus on:

- Our view of the nature of this study and that our comments are directed to Congress;
- Our belief that Congress needs to fully and clearly define the role of the Postal Regulatory Commission (PRC) as it pertains to protecting USPS monopoly products;

- Our recommendation that the Commission permanently create a new position of a "Mailing Industry Representative" that will be assigned to all applicable proceedings to represent the business mailing community and supply chain;
- Our stakeholder feedback on the impacts from the pandemic and other unforeseen events and the insufficiency of current ratemaking rules to adjust to these significant impacts;
- Our belief that a comprehensive review of the ratemaking rules adopted by the Commission in November 2020 needs to occur now, not in 2025, and needs to take into account the current financial condition and trajectory of the Postal Service;
- Our stakeholder input on the impacts that result from the size of USPS price changes and that the USPS still could better utilize its existing pricing flexibility to drive efficiency; and
- Our stakeholder input on the impacts that result from frequency and timing of USPS price changes and recommendation that the USPS in conjunction with the PRC study the direct and indirect costs to the USPS, including resource utilization, training/educating customers, consumer communication, software/hardware updates, and more, that the USPS incurs with each price change. These costs should be compared to the net revenue the USPS gains from doing multiple price changes in a year.

I. The Nature of the PRC Study and Our Response

As noted by the PRC in its invitation for stakeholders to provide input, as adopted by the Joint Explanatory Statement accompanying the Consolidated Appropriations Act, 2022, the House of Representatives Report 117-79 states:

> "Rate Increases for Market-Dominant Products.—The Postal Accountability and Enhancement Act of 2006 (PAEA) required the PRC to review the existing Market Dominant rate and classification system 10 years after the enactment of the PAEA. Based on this review, the PRC adopted rules in November 2020 providing greater pricing flexibility to the United States Postal Service (USPS). USPS has used this expanded authority to propose increasing certain postal rates effective August 20, 2021, by approximately 7 percent. The Committee is concerned with the size and timing of the rate increase and that the PAEA process did not account for the impact of the pandemic, including factors such as higher package revenues and emergency funding provided to

the USPS. The PRC is directed to study these factors and report to the Committee within 270 days on how these factors should impact the rate increases proposed by the USPS and the PRC rules adopted in November."

The PRC's invitation to stakeholders to provide input does not provide any additional information beyond the legislative request outlined above. In addition, the Commission has already provided its analysis and position on some of the topics included in the above language in various proceedings related to its ratemaking rules implemented in November 2020. Accordingly, NAPM's comments are directed to Congress in response to its request for stakeholder feedback on the issues noted above. It is our assumption that this PRC "study" will be designed to collect and provide such feedback to Congress, not that the Commission will perform in-depth analysis and arrive at conclusions on these issues, particularly since it has already and repeatedly done so in formal docketed proceedings. Our input in these comments is not an attempt to re-argue points raised in prior PRC proceedings to which the Commission has already responded. Our input is directed to Congress as the body requesting stakeholder feedback. We believe that the Commission has acted upon its honest interpretation of existing applicable laws, however we also believe that more clarity or improvements to some of the laws may be in order, and Congress is the appropriate body to address those comments to.

II. The Role of the Regulator for Monopoly Products

NAPM believes that Congress needs to more fully and clearly define the role of the Postal Regulatory Commission (PRC) as it pertains to protecting USPS monopoly products. Unlike the regulated models for utilities or energy that the PRC's role may have originally been based on, Market Dominant products are not competitive and end users have no equivalent alternatives to using the mail, so in essence it is a "pure" monopoly that requires more oversight and engagement from the regulator. The outcome of the ratemaking rules implemented by the Commission in November 2020 are reminiscent of the pre-PAEA ratemaking process which resulted in huge increases which now are occurring even more frequently, leaving monopoly products no ability to effectively plan or even litigate for consideration of relief. NAPM believes that Congress should better define or clarify the role of the regulator as it pertains to monopoly products and preventing the Postal Service's ability to engage in monopolistic behaviors.

There also should be consideration to requiring the Commission to permanently create a new position of a "Mailing Industry Representative" that will be assigned to all applicable proceedings to represent the business mailing community and supply chain -- similar to the existing requirement to assign a "Public Representative" in proceedings who is tasked with representing the "general public," but the Mailing Industry Representative should be a permanent position filled by someone with supply chain and business mail experience, not a rotating staff member that changes with each proceeding. The person in this new role should meet regularly with industry constituents and different segments of the supply chain to understand how "monopoly" decisions may impact different parts of the mailing industry as well as business mail users. The impacts from the outcome of various PRC proceedings on business mailers and the mailing industry supply chain are significantly different than the impact on the general public consumer, and, accordingly, a representative should be created to provide feedback to the Commission on those impacts. USPS price changes cause businesses using the mail and their service providers to make software, hardware and network changes. Complex mailing requirements, rules, procedures, promotion integration and more apply to businesses' use of postal products, so price changes are much more complex for businesses vs the general stamp consumers which have representation at the Commission today.

III. Impacts from the Pandemic and Other Unforeseen Significant Events

In its report language, Congress stated that "[t]he Committee is concerned with the size and timing of the rate increase and that the PAEA process did not account for the impact of the pandemic, including factors such as higher package revenues and emergency funding provided to the USPS. The PRC is directed to study these factors and report to the Committee within 270 days on how these factors should impact the rate increases proposed by the USPS and the PRC rules adopted in November."

In addition to the impacts from the pandemic on the Postal Service, NAPM members and others in the mailing industry were significantly impacted by conditions that occurred during the pandemic, many of which continue today. Labor shortages and increased labor costs, supply chain disruptions, inflationary pressures, loss of business through mail volume declines and more have significantly impacted our members. While the Postal Service and those supporting use of parcels may have seen business gains, and the Postal Service also had the benefit of receiving significant funds from Congress to help offset its pandemic losses, NAPM members and others in the mailing industry have experienced dramatically different business conditions. The rules implemented by the Commission in November 2020 were finalized before the full impacts of the pandemic occurred and did not take into account the financial relief the USPS received from Congress, its improved financial position from parcel revenue gains, or the negative impacts on users of the mail and the mailing supply chain.

The laws governing the USPS' Market Dominant ratemaking system and the Commission's role in regulating the USPS' ratesetting ability do not take into account significant impacts from unforeseen events. PAEA when enacted in 2006 did not foresee or account for the Great Recession and the impacts it would have on the mailing industry, the USPS, and the USPS' ability to meet the health benefit pre-funding requirements contained in the law. Similarly, the PRC's final rules fundamentally changing the ratemaking system implemented in November 2020 do not take into account the significant impacts from a global pandemic or double digit rates of inflation. There need to be mechanisms in the laws and rules governing USPS ratemaking that take into account these types of extraordinary events and their potential impact on USPS' finances – positive or negative. Rules and laws created during times of low and predictable CPI increases and stable global conditions often do not accomplish their desired purpose during events such as these.

IV. Comprehensive Review Needed Now

In the most recent USPS Market Dominant rate change request (RM2022-1), as in other PRC proceedings related to USPS rate changes and the rules adopted by the PRC in November 2020, stakeholders argued that the PRC rules modifying the rate system do not sufficiently take into account whether USPS rate changes meet the statutory objectives and factors of 39 U.S.C. § 3622(b) or factors of 39 U.S.C. § 3622(c). The Commission's response was that its final rules adopted in November 2020 "discontinued consideration of the objectives of 39 U.S.C. § 3622(b) and factors of 39 U.S.C. § 3622(c) in individual rate adjustment proceedings," because its modified ratemaking system was designed to properly balance the statutory factors and objectives of the Postal Accountability and Enhancement Act (PAEA) in advance of individual rate adjustments. Accordingly, the Commission found that "[i]f the Postal Service proposes a rate adjustment compliant with the final rules, then that planned rate adjustment would be consistent with the objectives and factors." The Commission in its order said it "declines to undertake a further review of the planned price adjustments' consistency with individual objectives and factors because such a review is outside the scope of the Commission's review in rate adjustment proceedings under the modified ratemaking system." In this case, as in other instances where stakeholders have raised issues related to the PRC's final rules on the ratemaking system, the Commission has said it will review the rules again in 5 years and that these issues may be considered then. Similarly, in its Order 6188, the Commission said it "also notes that it plans to review the modified ratemaking system 5 years after implementation and that such a review would necessarily include an assessment of the Postal Service's overall financial health in conjunction with consideration of whether the objectives of 39 U.S.C. § 3622(b) are being achieved under the modified ratemaking system."

The Commission's articulated plan to next review and consider modifications to its ratemaking rules is to do so in late 2025, which marks 5 years from the implementation of the Commission's ratemaking rules in November 2020. While it may have seemed prudent when the rules were finalized in 2020 to wait 5 years before conducting a comprehensive review of the rules, a global pandemic and its residual impacts demand a more rational approach in accelerating the review timeline to the present. In addition, implementation of the USPS' Delivering For America plan will have significant impacts that occur in less than 5-year increments, so a more frequent review and oversight will be necessary, particularly if the cost savings in the USPS' plan are realized.

Congress should seriously consider the likely impacts on the mailing industry (which includes businesses of all sizes who use the mail for transactional and marketing communications as well as industry service providers and suppliers such as our members) that will occur by 2025, given the current trends in the labor market, inflation, transportation/fuel, and supply chain. In just the first year and a half since the Commission adopted its final rules, businesses have seen compounded postage increases as high as 17% for First-Class Mail and up to 30% for other mail categories.

V. Size of Price Changes

Congress asked the PRC in this study to provide stakeholder feedback on the impacts from "size" of USPS price increases and the PRC accordingly has asked stakeholders for input on size of price changes.

NAPM members largely act as a bridge between the USPS and tens of thousands of end-user business customers. In this role, our members are not the "postage payers" or "mail owners" per se, but we support and work closely with those customers and our businesses are dependent on their use of USPS products & services. Our members' commingle, presort, and mail quality improvements and data services help reduce businesses' cost to mail and improve their ROI from using mail, as well as giving them access to discounted postage rates, which helps lessen the impact of USPS price changes.

Larger and more frequent price changes cause businesses to re-evaluate their use of mail and USPS' parcel services. Each price change results in customers performing new analysis and comparison of the ROI from mail versus other communication alternatives. The larger the price change, the more the ROI is negatively impacted, particularly if other factors also result in increased costs or reduced performance. Other factors can include not only other costs of using mail such as cost of paper, transportation, labor, etc. but also the performance factors of using mail such as USPS service performance, and changes that can impact mail response rates. Every price change causes businesses to perform a new total ROI analysis and if the USPS product no longer has a better ROI than alternatives, businesses will pursue the alternatives. Our members and others who support the USPS mailing and shipping industry are negatively impacted when businesses pursue non-USPS alternatives, which higher USPS price increases can lead to.

NAPM also believes, as the Commission has articulated in numerous proceedings, that the Postal Service still has ways it can better use its existing pricing flexibility to drive more efficient and lower cost mailer behaviors. Despite the improved rules implemented by the Commission pertaining to workshare passthrough, the Postal Service has not optimized its pricing flexibility. If the USPS opts to use all of its available rate authority in multiple price increases a year because it has been negatively impacted by conditions beyond its control, it should provide full passthrough of workshare cost savings to best incent mailers to engage in mail preparation and entry behaviors that improve mail quality and efficiency and reduce its costs, not to mention providing it with extensive mailing data to support dozens of initiatives.

While NAPM believes the Postal Service is aggressively pursuing cost reduction and service improvement initiatives such as those contained in its 10-year Delivering for America strategic plan, including a major redesign of its processing and logistics network, it may be some years before significant results are seen. In the interim, the USPS should be maximizing its use of tools available to it today to reduce its costs. Setting greater passthrough on workshare discounts drives more efficient and desirable mailer behaviors that bring significant benefits to the Postal Service including cost reduction, and has the added benefit of not reducing the overall net revenue to the USPS from its price change. Maximizing use of workshare also means the private sector assumes the risk and cost of mail preparation and entry activities, while allowing the USPS to remain “asset light” in markets where volume may be declining.

VI. Timing of Price Changes

Congress also asked the PRC in this study to provide feedback on the impacts from “timing” of USPS price increases and the PRC accordingly has asked stakeholders for input on the timing/frequency of price changes.

Every USPS price change has a significant impact on NAPM members and other mailers and service providers within the mail and shipping supply chain. Our Mail Service Provider members form annual or multi-year contracts with tens of thousands of business customers that are based, in part, on the USPS prices and discounts. A USPS price change typically means our members will need to work with their customers to renegotiate those contracts mid-year or multiple times within a year. The budget cycle for most of these customers is that budgets for the coming year are established in the fall, making it very difficult for customers to budget for two price increases given the uncertainty of CPI as well as the new rate authority categories the USPS was granted in the PRC's final rules implemented November 2020. In addition, many NAPM members and others support both Market Dominant and Competitive Services products. In the year between July 2021 and July 2022, there were a total of 4 major USPS price changes (2 for Market Dominant prices and 2 for Competitive Services prices) that required mailers and suppliers to make changes to systems, processes and customer agreements.

In addition to the cost and resource utilization that each price change brings for our members and others, there is the additional complexity of trying to support end-user business customers in their budget planning when they need to unexpectedly make mid-year adjustments due to USPS price changes. Each time USPS prices change, customers typically will conduct a review of their ROI from mail and revisit other communication alternatives since USPS price increases – particularly when combined with significant increases in the cost of paper, labor, transportation and other supply chain components – can have a negative impact on the ROI from using mail in comparison to other media choices. This re-evaluation of using mail, or in the case of parcels the re-evaluation of using USPS' products vs. competitors, also requires use of resources by our members who work hard to keep business customers using the mail.

Similar to the work, cost and resource utilization the industry must expend for every price change, the USPS also incurs costs, and tying up of resources which can impact its ability to work on other programs. NAPM suggests that the USPS in conjunction with the PRC study the direct and indirect costs to the USPS, including resource utilization, training/educating customers, consumer communication, software/hardware updates, and more, that the USPS incurs with each price change. These costs should be compared to the net revenue the USPS gains from doing multiple price changes in a year.

Another aspect of USPS price changes to be considered is whether a change is in prices only versus a change in prices with accompanying structural changes. The latter require significantly more work on the part of the USPS and the industry and often include significant changes in products, services, mail preparation/entry, or structure of price tiers that require more involved work for all.

All things considered, the USPS doing one price increase a year represents less cost and impact on the mailing and shipping industry, and on the USPS, than doing multiple price changes in a year. Working to time price changes for Market Dominant and Competitive Services products on the same schedule would also help reduce the impact on both the USPS and industry.

VI. Conclusion

In closing, NAPM appreciates Congress' interest in the views of stakeholders in the postal ecosystem, and we appreciate the Commission's response in inviting stakeholder views. Our comments are intended to be constructive and help those tasked with oversight of the Postal Service better understand the needs and concerns of our members, as well as the impacts price changes have on their businesses.

Respectfully submitted,

___/s/________________________

National Association of Presort Mailers
Robert Galaher, Executive Director and CEO
PO Box 3552
Annapolis, MD 21403-3552 www.presortmailer.org
eMail: bob.galaher@presortmailer.org
Phone: (800) 500-6276

From:	Holly Lubart
To:	Stakeholder Input
Subject:	News/Media Alliance Comments on USPS Rate Increases
Date:	Friday, July 29, 2022 5:32:54 PM
Attachments:	NMA Final PRC Comments 7-29-22 PDF .pdf

Good evening,

Please see the attached comments from the News/Media Alliance regarding the Commission study on Market-Dominant Rate Increases. Thank you.

Holly Lubart
Consultant
News/Media Alliance
717-385-0900

Via Email to: stakeholderinput@prc.gov

July 29, 2022

Postal Regulatory Commission
901 New York Avenue, N.W.
Suite 200
Washington, D.C. 20268

Re: Commission Study on Market-Dominant Rate Increases

The News/Media Alliance ("N/MA") appreciates the opportunity to provide input on the issues identified by the House of Representatives' Joint Explanatory Statement accompanying the Consolidated Appropriations Act of 2022 regarding the Commission's market-dominant price increases.[1]

The Postal Regulatory Commission failed to account for the impact of the COVID-19 pandemic on the Postal Service's financial condition during the ten-year rate system review. That failure, and the PRC's subsequent order authorizing substantially above-CPI rate authority for USPS, has had an enormous effect on newspaper and magazine publishers who rely on USPS to reach Americans. So much so, that we joined with the National Newspaper Association in submitting separate comments explaining how harmful these price increases have been to the news and magazine industry.[2] Our current comments address the Committee's concern that the PRC ignored financial tailwinds such as higher package revenues and Congressional funding to the USPS during the PAEA rate review.

About N/MA & Summary of Input

N/MA is comprised of two legacy organizations that have long been active participants in Postal Regulatory Commission proceedings and whose members are loyal postal customers: NMA – the News Media Alliance and MPA - the Association of Magazine Media. These entities merged on July 1, 2022, forming the leading voice for the news and magazine media industries that collectively generate more than $40 billion in annual revenue.

---

[1] "PRC Invites Stakeholder Consultation Regarding Study on USPS Rate Increases" (May 26, 2022), *available at* https://www.prc.gov/sites/default/files/Stakeholder%20input%20for%20appropriations%20act%20study.pdf (citing House H. Rep. No. 117-79 at 100 (Jul. 1, 2021).

[2] *See* Comments of the National Newspaper Association and the News/Media Alliance (July 27, 2022).

N/MA members represent many of the biggest and most renowned brands in the news publishing and magazine industries. Our members rely on the Postal Service to deliver valuable, compelling original journalism and educational, cultural, scientific, and informational periodicals to consumers. Our members also often rely on USPS Marketing Mail to help with promotions and/or deliver advertising on behalf of local businesses.

Like the House Appropriations Committee, N/MA has concerns about "the size and timing of the rate increase and that the PAEA process did not account for the impact of the pandemic, including factors such as higher package revenues and emergency funding provided to the USPS." We commend the Committee for directing the Commission to study these factors and to report the Commission's findings to the Committee. Congressional oversight such as this is important, as there has to date been insufficient scrutiny of the large rate increases the Postal Service has imposed on its captive customers under the Commission's revised rate regulations. While the Postal Service's Office of Inspector General recently found that the *Postal Service* complied with its contractual obligations under the CARES Act agreement with the U.S. Treasury Department,[3] the OIG audit did not address whether the *Commission* properly accounted for the CARES Act funding (nor for the significant financial tailwinds generated by package sales) when authorizing significant above-inflation rate increases during the PAEA docket. We believe that the Commission failed to do so, and that the Committee should be apprised of that failure.

The PRC's Density Authority Is Improper, Has Led to Exorbitant Rate Increases, and is Unnecessary Given USPS's Financial Performance

The new ratemaking regulations that the Commission adopted under the 10-year review did not properly account for the impact of the pandemic, particularly the beneficial effect of higher package revenues and $10 billion in emergency funding provided to the USPS. Rather, the Postal Service was compensated with tens of billions of dollars (present value) from ratepayers through the Commission's ill-designed density rate authority formula and $10 billion by taxpayers for an event that had no material effect on its finances.

While the House Report identifies the approximately 7-percent rate increase on market-dominant mail from August 2021 as a specific cause for concern (and we agree that it is), that rate increase paid by the Periodicals mailers was actually higher - approximately *9 percent* – due to the Postal Service's imposition of an optional two percent surcharge on Periodicals mail. This

[3] "Coronavirus Aid, Relief, and Economic Security (CARES) Act Funding" (July 7, 2022), USPS OIG Report No. 21-234-R22, *available at* https://www.uspsoig.gov/sites/default/files/document-library-files/2022/21-234-R22.pdf.

exorbitant rate increase on Periodicals was composed of the following rate authorities (the latter three which were based upon the Commission's FY 2020 ACD):

- CPI-U: 1.244%
- Density: 4.500%
- Retirement: 1.062%
- Non-Compensatory: 2.000%[4]

The general purpose of the density authority is to compensate the Postal Service for the negative effect of volume changes on USPS finances. This 4.5 percent increase, which represents the majority of the August 2021 rate increase, granted the Postal Service an additional $1.8 billion in revenue authority.[5] Furthermore, because subsequent rate increases will be applied to the resulting rates, this unjustified rate authority will remain in the rate base for market-dominant products in perpetuity, resulting in an annuity for the Postal Service at the expense of mailers with a present value of approximately $57 billion.[6]

However, as the pandemic showed and we have explained in numerous previous filings,[7] the density authority calculation methodology is fatally flawed. Treating all volume changes uniformly on a per-piece basis, when the unit contribution of competitive products is much higher (and contribution variance exists among market-dominant products as well), is poor regulatory policy and unsupportable. Clearly the impact of each piece of Priority Mail, carrying with it an average of $9.14 in revenue and $2.57 in contribution in FY 2020, on USPS finances is

[4] Docket No. R2021-2, United States Postal Service Notice of Market-Dominant Price Change (May 28, 2021) at p. 4, Table 3.

[5] Calculated by multiplying the "Before Postage" at the mail class level by 4.5% in each of the PRC-filed library references in Docket No. RM2021-2: PRC-LR-R2021-2/1, PRC-LR-R2021-2/2, PRC-LR-R2021-2/3, PRC-LR-R2021-2/4, and PRC-LR-R2021-2/5.

[6] Calculated by dividing the $1.8 billion in revenue authority by 3.2%, the discount rate used by USPS for the Retiree Health Benefits liability (*see* 2021 Report on Form 10-K, United States Postal Service, p. 40). This calculation is the method for calculating a present value of a perpetuity from [Perpetuity Definition (investopedia.com)].

[7] *See* Docket No. RM2017-3, Supplemental Comments of the National Postal Policy Council, the American Bankers Association, the American Catalog Mailers Association, the American Forest & Paper Association, the Association for Mail Electronic Enhancement, the Association for Postal Commerce, the Association for Print Technologies, the Envelope Manufacturers Association, the Greeting Card Association, the Major Mailers Association, the National Retail Federation, MPA – the Association of Magazine Media, the National Association of Presort Mailers, the News Media Alliance, the National Newspaper Association, the Parcel Shippers Association, Printing United Alliance, and the Saturation Mailers Coalition (July 6, 2020) pp. 6-14.

much higher than each piece of USPS Marketing Mail, carrying with it only 21.7 cents of revenue and 4.9 cents of contribution.[8]

Looking only at volume (as the density authority calculation does), one would have predicted the Postal Service's financial performance to have cratered in FY 2020, but it didn't because the revenue and associated contribution increases from package volumes more than offset that from declines in mail volume.

Table 1—FY 2019 v. FY 2020

	Volume Change (billions)		Revenue Change (billions)	
	Pieces	**Percent**	**Dollars**	**Percent**
Market Dominant Products	-14.8	-10.8%	-$4.0	-8.7%
Competitive Products	1.5	25.7%	$6.4	26.5%
Total	**-13.4**	**-9.4%**	**$1.9**	**2.7%**

Source: Public CRA Reports

In actuality, the revenue increases generated from higher package volume more than offset the negative effect on the Postal Service of volume declines in much lower-contribution USPS Marketing Mail, as shown in Table 2. From FY 2019 to FY 2020, USPS revenue increased by 2.7 percent, more than inflation (1.4 percent[9]) during the same time period.

Table 2—Change in Volume & Revenue

	FY 2019 to FY 2020 Change (billions)		FY 2020 Unit	
	Volume	**Revenue**	**Revenue**	**Contribution**
First-Class Mail	-2.7	-$1.1	$0.456	$0.226
USPS Marketing Mail	-11.5	-$2.4	$0.217	$0.049
Competitive	1.5	$6.4	$4.293	$1.569

Source: Public CRA Reports

This resulted in FY 2020 actual net income being quite comparable to the USPS plan and not much different than FY 2019 actual results, as shown in Table 3. This was not brought about by improved postal efficiency as total factor productivity (TFP) declined by one percent in FY 2020.[10]

---

[8] Docket No. ACR2020, USPS-FY20-1, Public_FY20CRAReport.Rev.2.22.21.xlsx, "Cost3" and "Cost1", respectively.
[9] Data.bls.gov, Series Id: CUUR0000SA0.
[10] FY 2020 Annual Report to Congress, United States Postal Service, p. 53.

Table 3—FY 2019 Actual, FY 2020 Plan, & FY 2020 Actual USPS Financial Results

(in billions)	FY 2019 Actual	FY 2020	
		Plan	Actual
Revenue	$71.2	$71.7	$73.1
Cost*	$77.7	$79.2	$80.6
Net Income*	-$6.7	-$7.6	-$7.6

Source: USPS Preliminary Financial Information, Unaudited
* Figures adjusted to exclude non-cash workers' compensation

The favorable trend continued in FY2021. The Commission recently noted that the Postal Service's total revenue in FY2021 "was $77.1 billion, which was $6.2 billion more than planned." The Postal Service attributes this improving financial performance to "better-than-expected mail volumes and a continued surge in package volumes."[11]

The PRC Failed To Account For the COVID Pandemic in its Regulatory Analysis

According to the Postal Service, "[t]he COVID-19 pandemic continued to impact the Postal Service's financial health in FY 2021[,]" leading to "significant increases in customer demand for package delivery services…."[12] In contrast, within the confines of the PAEA ten-year review, the Commission ignored COVID's impact on the Postal Service's financial condition, finding that "nothing specific to the pandemic undermines the findings the Commission made [regarding the USPS's financial condition] in Order No. 4257."[13] The Committee's concern that the Commission neglected to account for COVID's positive effect on the Postal Service's finances when promulgating new rate rules is well-founded.

The Committee is also correct in its concern that the Commission made no adjustment to the density or any other rate authority to account for the $10 billion in emergency funding provided by the CARES Act. Indeed, the Commission explicitly disclaimed any relevance between Congress' largesse and the Commission's ten-year review analysis.[14] This was clearly inappropriate: any analysis of the Postal Service's financial stability must have accounted for Congressionally administered funds designed to shore up USPS's financial condition.

[11] "Analysis of the Postal Service's FY 2021 Annual Performance Report and FY 2022 Performance Plan," (June 30, 2022) at 108 (citing USPS FY 2021 Annual Report at 47-48).
[12] *Id.* (citing USPS FY 2021 Annual Report at 46).
[13] *See* Order No. 5763, Docket No. RM2017-3 (Nov. 30, 2020) at 26.
[14] *See id.* at 29 ("the increase in borrowing authority made available to the Postal Service in the CARES Act does not impact the Commission's analysis."). Shortly after the Commission issued its final regulations in November 2020, Congress passed additional legislation negating the Commission's obligation to repay the $10 billion, transforming the money from a loan to a capital contribution.

To more meaningfully participate in the 10-year review proceeding, and to learn more about whether the Commission's authorization of above-CPI price increases properly accounted for the impact of the COVID-19 pandemic (including Congress' provision of $10 billion in funding to the Postal Service), the-then MPA requested that the Commission issue an information request to USPS on this topic. However, the Commission denied the motion and explained in perfunctory fashion that it "does not intend to issue any information requests or other discovery during the consultation period."

Impact of Postal Rate Increases

The Commission's failure to properly account for higher package revenues and Congress' $10 billion grant not only blemishes the ten-year review process; it also has resulted in real-world negative consequences for business mailers and American consumers. This is because the authorization of above-inflation price increases driven by density declines, as well as an additional two-percent surcharge levied on Periodicals, has resulted in our members facing enormous postage rate increases both in August 2021 and July 2022. Because they are now embedded in the rates, these increases will be compounded by future increases. And the Postal Service has clearly indicated that it expects to continue to use all of its available authority in the future, making the damage even worse.

Just since the beginning of 2021, the Postal Service has raised Periodicals and USPS Marketing Mail prices by 19.8 percent and 15.5 percent, respectively, and will likely raise them by another ten percent or more next year. These rate increases have magnified pressure on news and magazine publishers in both their editorial and advertising products. In some cases, our members have been forced to mitigate the impact of these postage rate increases by shuttering titles, reducing circulation frequency, reducing staff, and lowering paper quality. In addition, they have had to pass on rate increases to consumers and to business partners such as advertisers. Those attempts have met with resistance, as both advertisers and consumers face pricing constraints as well.

Overall, Periodicals volumes have declined by 27 percent from 2019 pre-pandemic levels due to exorbitant price increases under the new ratemaking regulations, which has in turn hurt our members, other businesses, and the general public significantly. The increases have also dramatically raised the cost of advertising mail, hurting members who use it to serve local business customers and those businesses themselves. Since N/MA publications are sought by their recipients and thus contribute to the "mailbox moment" – supporting the appeal of the mail

– the long-term consequence will be to diminish the importance of the Postal Service to the public.

CONCLUSION

N/MA's input on the issues raised by the House Report is that: (1) the size and frequency of market-dominant (particularly for N/MA Periodicals and Marketing mail) rate increases under the new ratemaking regulations are exorbitant and are hurting mailers, readers, and advertisers, as well as the national interest in the dissemination of information; and (2) we believe that the Commission did not properly account for the COVID-19 pandemic's impact on the Postal Service's financial condition as part of its ten-year review analysis.

Danielle Coffey
Executive Vice President & General Counsel
News/Media Alliance
4401 N. Fairfax Dr., Suite 300
Arlington, VA 22203
(202) 641-7434
Danielle@newsmediaalliance.org

Rita Cohen
Consultant
News/Media Alliance
4401 N. Fairfax Dr., Suite 300
Arlington, VA 22203
(571) 366-1000
Rita-consultant@newsmediaalliance.org

Holly Lubart
Consultant
News/Media Alliance
4401 N. Fairfax Dr., Suite 300
Arlington, VA 22203
(571) 366-1000
Holly@newsmediaalliance.org

Rita Cohen
Consultant
News Media Alliance
4401 N. Fairfax Dr., Suite 300
Arlington, VA 22203
(571) 366-1000
Rita-consultant@newsmediaalliance.org

Holly Lubart
Consultant
News Media Alliance
4401 N. Fairfax Dr., Suite 300
Arlington, VA 22203
(571) 366-1000
Holly@newsmediaalliance.org

From:	Schimek, Robert
To:	Stakeholder Input
Cc:	Henke, Jeff; McKenna, Don; Henderson, Patrick
Subject:	Quad Comments Regarding USPS Rate Increases
Date:	Friday, July 29, 2022 3:57:41 PM
Attachments:	image002.png image003.png image004.png image005.png Quad PRC Final Comments 07_29_2022.pdf

---

The attached document is being provided by Quad regarding the PRC study on USPS Rate Increases with comments due July 31st.

Bob Schimek
Director - Postal Affairs

Sussex, WI
o: 414-566-2392
c: 608-799-0465
QUAD.com

Quad

Uncomplicating Marketing.
Delivering More.

N61 W23044 Harry's Way
Sussex WI
53089
tel 414.566.2392
www.Quad.com

July 29, 2022

Michael Kubayanda
Chairman, Postal Regulatory Commission
901 New York Avenue, NW
Suite 200
Washington, DC 20268-0001
Via email to: stakeholderinput@prc.gov

Dear Chairman:

Quad appreciates the opportunity to provide comments to the PRC regarding its study on USPS Rate Increases from May 26, 2022.

Based on our recent meeting on June 15, 2022, the PRC is aware that Quad and our customers provide a significant amount of volume and postage to the United States Postal Service. 8.6 billion pieces and $2.36 billion dollars in postage in 2021. The cost of postage now accounts for over 60% of the cost of a mailing and therefore the performance of the USPS and the cost to be in the mail drive decisions for our customers on a daily basis.

Concerns regarding size of rate increase:
In our June meeting, we shared with you the result of the 3 price changes that have taken place over the past 18-months and the impact that those increases are having on mail owners and the volume they are able to supply the USPS. These multiple price increases compound on each other and therefore each price increase continues to impact mailers each successive year, not just in the year that the increase is implemented. Examples include Marketing Mail Flats Piece rate up 22.39%, Marketing Mail Non-Profit Piece rate up 28.01%, Periodicals up 19.2%.

The additional rate authority provided by the density adder is excessive, is counterproductive and needs to be removed as it provides a perverse incentive for the USPS. The cost of postage accounts for over 60% of the total cost to produce a mailing. The size of these postage increases are forcing mail owners to make difficult decisions to reduce production runs and it is accelerating the movement away from mail as a viable alternative to other media channels. Some customers have defined models that determine how much mail volume will be reduced based on the size of a postage increase.

Quad also requests that the PRC review the required additional 2% rate authority to underwater products within a class. Historically that was assumed to be a once a year requirement, but now that the USPS has communicated that is will be doing twice a year price increases, this is doubling the additional penalty to underwater products. From the industry perspective, both this additional authority and the new 2% additional authority for underwater classes is seen as a disincentive for the USPS to make needed cost reductions. The PRC should clarify that the 2% for underwater products should only be applied once annually and the new 2% rate authority for underwater classes should be eliminated and replaced with incentivies that will provide the proper incentives for the Postal Service to implement cost reductions.

Concern regarding timing of rate increase:
Annual price increases, implemented in January of each year have now been replaced with twice a year price increase occurring in January and July. This change combined with the additional rate authority has completely destroyed the postal budgeting process for mail owners.

Mail Owner postal budgets are often prepared in the Fall for the next calendar year. Annual price increases implemented in January based solely on CPI allowed for a fairly accurate budgeting process. Our customers' planning and budgeting process aligned well with the USPS's traditional process of filing proposed rate increases in October and implemented in January . The twice a year increase combined with the additional rate authority has completely destroyed that predictablilty. The additional rate authority that the USPS uses in July is not known until the end of March when the PRC completes their Annual Compliance Determination, well after the bugeting process has been finalized. Two "half-year" uses of the available CPI rate authority also creates additional unpredictability around the budgeting of what CPI will be available to the USPS to use in the July increase.

Once budgets are set, they often cannot be changed, so if the budget for the additional rate authority in March or the estimate for the CPI authority for July are wrong, the only option is to reduce the volume of mail to match the budget. This not only reduces volume for the USPS, it results in less advertising for businesses across the country impacting the economic performance of our economy as a whole.

One final concern regarding timing of rate increases. Based on the January and July 2022 price increases, the Postal Service does not have the technical capability to support twice a year price increases. While the USPS does provide all the necessary information for the PRC to review and approve the prices with 90 days notice, a significant amount of industry requirements for the price change are provided with far less than 90 days notice. The July 2022 price increase provided a new discount for direct containers. The requirements for eligibility to claim that new discount were changed ("clairified"), less that two weeks before implementation. The filing of a price change with the PRC should also require that all technical and DMM requirements have also been documented and finalized at the same time. Providing the industry with the same 90 days notice to prepare for all the required changes.

Thank you for your consideration in these matters.

Sincerely,

Bob Schimek
Director, Postal Affairs

rschimek@quad.com
414-566-2392 office
608-799-0465 mobile

From:	Lynn Storey
To:	Stakeholder Input
Subject:	MHBG comments to PRC re: postal rate increases
Date:	Friday, July 29, 2022 3:16:23 PM
Attachments:	MHBG comments for PRC 072622.pdf

Attached please find Mercy Home for Boys & Girls' comments to the PRC re: postal rate increases.

If you have any questions regarding the attached, please let me know.

Thank you for the opportunity to comment.

SINCE 1887

MERCY HOME FOR BOYS & GIRLS

July 26, 2022

Postal Regulatory Commission
901 New York Avenue NW, Suite 200
Washington, DC 20268-0001

Re: Feedback requested on postage increases

Dear Commissioners:

Mercy Home for Boys & Girls was established in 1887. We're a therapeutic home for kids and young adults in Chicago, ages 11-24, who've suffered the trauma of abuse, neglect and neighborhood violence.

We provide therapeutic and educational supports to help them heal from their trauma and imagine and embark on positive futures. We cover our kids' needs for postsecondary education, if that's what they want to pursue, and we promise a continuum of care for their lives – whenever they may need us, we'll be there.

At any given time, we might have just under 200 kids that live with us, but we positively impact the lives of hundreds more children and families each year via our mentoring and community care programs.

Direct mail appeals are the backbone of most well-established nonprofits, and Mercy Home is no exception to that rule. Direct mail is the preferred giving channel of the vast majority of today's donors and will be for decades to come.

Direct mail fundraising drives Mercy Home's immediate revenue needs, but also provides for future income via planned gifts and other deferred gift opportunities.

In FY22, about 53% of Mercy Home's revenue came from direct mail generated gifts. In the renewal portion of our program alone, postage costs comprised 50% of total direct mail expenses.

In FY23, we're budgeting about $3.2 million in postage expense - that's equivalent to 16% of all the money we currently spend on direct care for our kids. If costs increase twice a year for the next 5 years as proposed, Mercy Home will be spending 19% of its program budget on postage alone by the end of that period.

The current postal rate increase plan is unsustainable for nonprofits great and small, and will significantly cripple our ability to serve the individuals and communities that we do. Organizations like Mercy Home will be forced to cut back on mailings, which impacts our ability to raise funds and, ultimately, will reduce the number of children and families we can help.

From:	lraymond
To:	Stakeholder Input
Subject:	Response to Request for Stakeholder Input
Date:	Friday, July 29, 2022 2:41:38 PM
Attachments:	image001.png Response to Request for Comments.pdf

Please accept the attached in response to the Postal Regulatory Commission's request for stakeholder input, per the Joint Explanatory Statement accompanying the Consolidated Appropriations Act, 2022.

Leo Raymond
lraymond@mailershub.com
(703) 624-3761

Mailers Hub
Bringing Commercial Mailing, Resources, and Solutions Together

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

RESPONSE TO REQUEST FOR STAKEHOLDER INPUT	Joint Explanatory Statement accompanying the Consolidated Appropriations Act, 2022

COMMENTS OF MAILERS HUB
(July 29, 2022)

Mailers Hub hereby submits comments in response to the Postal Regulatory Commission's request for stakeholder input, per the Joint Explanatory Statement accompanying the Consolidated Appropriations Act, 2022.

I. BACKGROUND.

Over the nearly fifteen years and four months between enactment of the Postal Accountability and Enhancement Act (December 20, 2006) and enactment of the Postal Service Reform Act of 2022 (April 6, 2022), the Postal Service was subject to an obligation to contribute $55.8 billion to the Postal Service Retiree Health Benefits Fund to "prefund" decades of future retiree health costs. The agency had generated net income for several preceding years, and was debt free at the end of Fiscal Year 2005, but once the prefunding obligation was implemented the Postal Service struggled. It maximized its borrowing authority and took other measures, but soon found itself unable to make the required payments, defaulting on the amounts due in Fiscal Year 2011 and thereafter.

Beyond that, the concurrent economic history of the Postal Service and the nation is a matter of record, and notably includes the 2007-2009 recession, the Postal Service's 2010 "exigent" rate filing, the COVID pandemic that impacted mail and package volume beginning in 2020, and the ongoing decline of volume of and revenue from hard-copy mail.

The PAEA also replaced the cost-of-service ratemaking process established by the 1970 Postal Reorganization Act with a "modern system for regulating rates and classes for market-dominant products," prescribing nine objectives the new system was expected to achieve and fourteen factors that the Commission had to "take into account." The new system took less time, was less litigious, and was built around a cap on postal rate increases linked to the Consumer Price Index.

The PAEA further mandated that, ten years later, the Commission was to undertake an evaluation of the statute's ratesetting system to determine if it was achieving the stipulated objectives, taking the factors into account. The statute added that

> "If the Commission determines, after notice and opportunity for public comment, that the system is not achieving the objectives in subsection (b), taking into account the factors in subsection (c), the Commission may, by regulation, make such modification or adopt such alternative system for regulating rates and classes for market-dominant products as necessary to achieve the objectives."

At the end of Fiscal Year 2015, after a decade of operating under the PAEA, the Postal Service reported a net loss of $5.06 billion, an accumulated net deficiency of $50.391 billion, and $54.817 billion in unfunded obligations. The USPS had lost money every fiscal year since enactment of the PAEA; those annual losses totaled $56.765 billion.

In December 2016, five weeks after the Postal Service's FY 2015 financial results were released, the Commission began its required review by initiating a rulemaking under Docket RM2017-3. Nearly four years later, after rounds of comments and reply comments, motions and orders, and the issuance of revised proposed rules, the Commission issued a final rule on November 20, 2020.

The essential finding of the Commission's review was that the ratesetting system was not meeting all of the objectives listed in the PAEA, notably Objective 5 ("To assure adequate revenues, including retained earnings, to maintain financial stability"). Accordingly, as the statute allowed, the Commission's final rule established three new forms of rate authority for the Postal Service ("density," "prefunding," and "non-compensatory") that supplemented the existing CPI-based rate authority so that, collectively, the Postal Service could generate the additional revenue to move it toward "financial stability."

What the statute did *not* empower the Commission to do was examine the causes for the Postal Service's financial circumstances and, in turn, to shape its evaluation and proposed changes accordingly. In effect, the statute simplistically presumed that any weakness in the Postal Service's financial condition was directly caused by inadequacies in the ratesetting system, and that changing that system could, by itself, reverse that weakness. The burden of the prefunding obligation, the impact of the 2007-2009 recession, losses of volume to electronic media, inefficiencies in postal operations, and other factors were beyond the purview of the Commission's assignment, as was the potential impact on ratepayers and mail volume from above-CPI price increases.

Consequently, constrained by the statute's narrow charter, the Commission's final rule, and the new rate authorities it contained, were virtually unavoidable. (Some parties disagreed with the

Commission's statutory empowerment under PAEA, and on the actions it took in its final rule, but that discussion is not germane to these comments.)

II. Changing Circumstances.

In the instant exercise, the Congressional mandate contained in the Joint Explanatory Statement accompanying the Consolidated Appropriations Act, 2022 invited observations that are less constrained; as House of Representatives Report 117-79 stated:

> "Rate Increases for Market-Dominant Products.—The Postal Accountability and Enhancement Act of 2006 (PAEA) required the PRC to review the existing Market Dominant rate and classification system 10 years after the enactment of the PAEA. Based on this review, the PRC adopted rules in November 2020 providing greater pricing flexibility to the United States Postal Service (USPS). USPS has used this expanded authority to propose increasing certain postal rates effective August 20, 2021, by approximately 7 percent. *The Committee is concerned with the size and timing of the rate increase and that the PAEA process did not account for the impact of the pandemic, including factors such as higher package revenues and emergency funding provided to the USPS.* [Emphasis ours.] The PRC is directed to study these factors and report to the Committee within 270 days on how these factors should impact the rate increases proposed by the USPS and the PRC rules adopted in November.

It seems reasonable to conclude that the legislators who authored the above-cited report were concerned that the circumstances under which the Commission shaped its final rule may have changed, that the final rule now is enabling price increases on market-dominant products that are too aggressive or no longer appropriate, and that, despite the opinion of postal leadership, those increases may be adversely impactful on mail volume (and revenue) as well as the general effort to preserve hard-copy mail. Price increases exceeding 13% in less than a year, and a USPS policy of seeking to "maximize revenues" through further semi-annual price increases, likely explain, and contributed to, the legislators' concerns.

The Postmaster General has stated he would increase prices semi-annually until the agency's costs are covered, but has not been as explicitly committed to seeking reductions in those costs as he has to frequent price increases. As history has shown, the ability to increase revenues reduces the urgency of, and the incentive for, cost reduction. Historically, whether under the cost-of-service regime or under the CPI-capped ratesetting system, the Postal Service has a record of failing to control costs, instead returning to the ratepayers' well to compensate for that failure. The added rate authority granted by the November 2020 final rule only exacerbated this situation, and arguably is at odds with the PAEA's Objectives 1 ("maximize incentives to reduce costs and increase efficiency") and 2 ("predictability and stability in rates") as well as Factor 3 ("the effect of rate increases").

Neither the Commission nor Congress set specific, enforceable targets for USPS cost reduction as a prerequisite for tapping the added authority, so the Postal Service readily took advantage of the easier alternative and procrastinated the more difficult task of energetically cutting costs.

To borrow a phrase from the Postmaster General, we believe that the Commission would be "judicious and prudent" to revisit its 2020 rulemaking in light of the significantly different circumstances in which the Postal Service now finds itself.

The agency received $10 billion from Congress under the CARES Act, has had past and future obligations estimated to be as much as $107 billion erased by the PSRA, and has benefitted from recent revenue growth from its competitive products. Clearly the math has changed since 2020. Meanwhile, the availability of added rate authority – especially under the "density" provision – has eviscerated a central tenet of the PAEA's ratemaking scheme, i.e., that a cap on prices would force the Postal Service to find greater efficiencies and restrain the growth of expenses, notably its labor costs – not something that the PAEA's Objective 1 would condone. Ironically, as unmoderated price increases drive away volume, the "density" provision of the 2020 final rule effectively negates any adverse financial consequences for the Postal Service (some say it's effectively rewarded for not striving to retain volume) – not the intention of Congress in granting license to the Commission to amend the ratesetting system nor, likely, the desired outcome that the Commission itself sought to enable.

Some things remain as true now as they were in 2006 – and 2016. The Postal Service needs to get greater productivity from its workforce and functional operations; it needs to rework its infrastructure to enable efficient processing and delivery of the current and anticipated mail mix; and it needs to ensure that its current and potential customers are attracted and retained by reasonable rates and quality service. The Postmaster General's ten-year plan is addressing some of these needs, but largely disregards hard-copy mail (other than as a revenue source) in favor of fostering prospective growth in packages – a business segment already dominated by very competent competitors.

While making market-based decisions about the processing, delivery, and pricing aspects of competitive products, the USPS largely has ignored that approach regarding the monopoly classes and market-dominant mail generally. Stating that he won't try to compete with electronic media, the Postmaster General has essentially dismissed traditional mail as a lost cause that can be bled of all possible revenue as long it lasts.

Such a policy is not in the public interest nor consistent with what's been expected of the Postal Service historically, traditionally, or legislatively. Accordingly, any actions by the Commission, to the extent the Commission has the statutory latitude to define them, should not facilitate pricing strategies by the Postal Service that extract maximum revenue from market-dominant mail indifferent to the consequences of such a policy on short-or long-term volume.

Moreover, the Postal Service is on the cusp of a wholesale revision of its processing, transportation, and delivery infrastructure, overtly to remove inefficiency and reduce transportation, but also to yield a configuration better suited to process and deliver the putative increase in parcel volume on which the Postmaster General's plan focuses.

Though the Commission has enforced the statutory prohibition of cross-subsidization, it's arguable that another, more subtle form of cross-subsidization is occurring when the Postal Service's aggressive price increases on market-dominant mail contribute to underwriting facility, transportation, and delivery changes meant to support the growth of competitive products. Though the revised integrated network is nominally designed to benefit all postal products, it's notable that many of the redesign's features – such as added package processing equipment – will enhance the processing and delivery of parcels (competitive products), not the shrinking volume of market-dominant mail. How this comports with the PAEA's Objective 9 ("allocate the total institutional costs of the Postal Service appropriately between market-dominant and competitive products") deserves exploration.

III. Updating the Final Rule.

Therefore, in light of the foregoing, if the Commission is to revisit its 2020 rulemaking – as we encourage it to do – we believe the Commission should conclude that the Postal Service's financial outlook has significantly improved, that a majority of the factors underlying anticipated losses have been ameliorated, and that any remaining movement toward financial equilibrium no longer needs the additional authorities granted the USPS by the Commission's 2020 final rule.

The Commission should examine how its "density" provision has operated perversely to reward the Postal Service with additional rate authority when the agency's use of prior rate authority essentially drove away mail volume. We don't believe that to be what Congress or the Commission wanted to enable. If "density" is retained – and we don't advocate that – there at least should be mechanisms implemented that link it to the success of USPS efforts to retain volume, or mitigate volume loss. Simply put, the Postal Service should not be able to raise prices under "density" because its pricing and service policies contributed to declines in mail volume and revenue.

We also believe that the PSRA voided the reasons for the added "prefunding" authority. Existing obligations for retirement and health care costs should be satisfied on a pay-as-you-go basis.

Lastly, it's inarguable that there remains work to be done to bring "underwater" products to appropriate levels of cost coverage. Preserving the 2020 final rule's 2% additional rate authority for price increases on those products should be preserved – but suspended until the Commission is satisfied that the Postal Service has implemented *effective* steps to reduce costs for flats processing (many of the underwater products consist mostly or entirely of flat-sized mail). So long as the Postal Service can propose, but not actually bring to fruition, the measures necessary to improve productivity and efficiency, particularly for flats, and instead simply raise prices to cover uncontrolled costs, we believe it will do so. Such a counterproductive pattern should be neither enabled nor rewarded by the Commission.

In recent comments, the Postmaster General stated that the Postal Service "endured a defective pricing model that was allowed to exist for fourteen years, basically subsidizing our mailing industry to the significant detriment of our organization." Such a comment suggests that the Commission's periodic reviews of USPS price filings failed to ensure that the rates paid by customers were adequate to cover the costs for the corresponding mail, or that the Postal Service should have been spending more, perhaps for infrastructure work or employee compensation, but was constrained by the Commission's actions or the ratesetting system itself. If so, the need for an enforceable braking system on postal price increases is all the more essential if the captive users of market-dominant mail are to be saved from abusive pricing practices by a Postmaster General who sees them as little more than cash cows. Moreover, in light of the absence of forceful cost controls as mentioned earlier, it seems all the more inappropriate to enable further revenue extraction from market-dominant mail by continuing the additional rate authorities provided by the 2020 final rule.

IV. CONCLUSION.

We don't mean to minimize the challenges facing the Postal Service and its executive leadership. Finding a balance between cost, service, and price is not easy, but – contrary to the beliefs of some postal executives – most of the Postal Service's ratepaying customers are quite capable of moving their messages out of the mail if a suitable balance cannot be found. The current pattern of poorer service, unmitigated costs, and frequent price increases is providing them with the necessary motivation.

In addition, aside from the expectations of the PAEA, the current ratesetting system, as amended to facilitate achievement of a major objective the Act, has instead been used by the Postal Service to seek repeated outsized price increases on market-dominant mail while simultaneously eschewing equally aggressive cost reductions and investing in network changes clearly meant to support competitive products – not the classes subject to the final rule's provisions.

As the Postal Service's regulator, representing the interests of ratepayers and the larger industry that serves them, and as the agency tasked with obtaining – and, presumably, acting upon – the input of postal stakeholders, we believe the Commission should use every opportunity and statutory tool at its disposal to require more assertive cost controls and productivity improvements by the Postal Service, an assignment of USPS network redesign costs to the postal products that the redesign is intended to benefit most, and allow use of over-CPI price increases by the USPS only under clear and unavoidable circumstances.

Accordingly, the 2020 final rule should be reconsidered and its grant of additional pricing authority to the Postal Service reduced and restricted accordingly.

Respectfully submitted,

Leo Raymond
Mailers Hub LLC
108 Brafferton Blvd.
Stafford VA 22554-1514
(703) 831-3151
lraymond@mailershub.com

From:	Cally Peterson
To:	Stakeholder Input
Cc:	Josh Kramer; Zachary Smith
Subject:	USPS Rate Increases, H. Rep. No. 117-79
Date:	Friday, July 29, 2022 1:17:58 PM
Attachments:	image001.png image002.png PRC_PostalRateIncrease_NDAREC_JULY 2022.pdf

On behalf of North Dakota's electric cooperatives, please accept the attached letter in response to postal rate increases and the issues identified by the U.S. House of Representatives Report 117-79.

Thank you for your consideration.

Cally Peterson
Editor

NORTH DAKOTA LIVING
NORTH DAKOTA'S BEST READ PUBLICATION

cpeterson@ndarec.com
Direct: 701.667.6420 • **Cell**: 701.320.6825
PO Box 727 • 3201 Nygren Drive NW • Mandan, ND 58554-0727
www.ndliving.com

NDARECs
North Dakota Association of Rural Electric Cooperatives

Phone: 701.663.6501 or 800.234.0518
Fax: 701.663.3745 www.ndarec.com
3201 Nygren Drive NW • P.O. Box 727
Mandan, ND 58554-0727

July 29, 2022

Chairman Michael M. Kubayanda; Vice Chair Ann C. Fisher;
Commissioners Mark Acton, Ashley E. Poling and Robert G. Taub
United States of America Postal Regulatory Commission
901 New York Ave. N.W., Suite 200
Washington, DC 20268-0001
Sent via email to StakeholderInput@prc.gov

RE: USPS Rate Increases, H. Rep. No. 117-79

Chairman Kubayanda, Vice Chair Fisher and members of the Commission:

On behalf of North Dakota's electric cooperatives, please accept these comments in response to postal rate increases and the issues identified by the U.S. House of Representatives Report 117-79.

The North Dakota Association of Rural Electric Cooperative (NDAREC) is the nonprofit trade association representing 16 local electric cooperatives and five generation-and-transmission cooperatives operating in North Dakota. These local electric cooperatives provide electricity to more than 250,000 consumer-members and power homes, farms, businesses and emergency services in primarily rural or remote areas, on five federally designated Native American reservations, and in urban areas.

North Dakota's electric cooperatives are owned by the people they serve and provide power to consumer-members in every county of the state, including several underserved communities, areas of persistent poverty and disadvantaged census tracts. Thirty-six of the state's 53 counties, or 67%, are frontier counties, meaning they have six or less persons per square mile. As rural electrification has proven to be an important and vital institution in rural America, so is rural mail delivery.

As nonprofit, consumer-owned and consumer-governed organizations, North Dakota electric cooperatives utilize mail for many reasons, including sending essential member information, bills and bill inserts, and distributing its statewide cooperative magazine, *North Dakota Living*, to 105,000 homes, farms and businesses in North Dakota. *North Dakota Living* is the chief communications tool electric co-ops use to communicate with their members. The magazine shares critical information with co-op members each month, including their cooperatives' financial condition; how they can participate in co-op elections and select members to represent them on co-op boards of directors; board meeting minutes; annual meeting attendance details; and education on safe electric use, energy-management programs and money-saving electric tips.

Since being established in 1957, the *North Dakota Living* magazine has been proudly distributed to its readers and co-op members utilizing the U.S. Postal Service (USPS). In Title 39 of U.S. Code, USPS is charged with providing "a maximum degree of effective and regular postal services to rural areas." The back-to-back USPS rate increases of 2021 and 2022 disproportionately affect rural people, including our members, and run counter to USPS fulfilling its Title 39 mission. Further, this deepens the equity gap of thousands of people living in underserved rural communities.

When the August 2022 rate increases went into effect, our monthly postage costs to mail *North Dakota Living* increased 9.18%. A comparison of the postage costs to mail the January 2021 and January 2022 magazine issues, which had the same number of pages and paper weight with similar circulation, reveals an 18.3% increase in one year's time. These rate increases are the largest we have seen – and at an unprecedented frequency. Co-ops must pass the cost of postage increases to their consumer-members, at a time when economic pressures are weighing heavily on all Americans. And, these 2021 and 2022 rate increases, combined with rising costs of paper and ink, could force electric cooperatives to pursue digital communications options more aggressively, ultimately decreasing postal service volume.

North Dakota Living is part of a national network of electric cooperative publications that together reach more than 9.8 million American households, making it the fourth largest magazine network in the country. Our combined contribution to USPS is estimated to be close to $40 million per year.

The effect of these increases, and potential future increases, will come at a cost to our members, rural and underserved communities and USPS. NDAREC joins the National Rural Electric Cooperative Association and the Alliance of Nonprofit Mailers to urge the reconsideration of planned rate increases for postal products and services.

Thank you for your consideration.

Josh Kramer

Josh Kramer
Executive Vice President & General Manager

From:	Stephen Raher
To:	Stakeholder Input
Subject:	Stakeholder input regarding study on USPS rate increases
Date:	Friday, July 29, 2022 1:16:47 PM
Attachments:	2022-07-29 - PPI stakeholder input comments.pdf

To Whom it May Concern:

Pursuant to the PRC's announcement of May 26, 2022, please accept the attached comments for consideration as part of the Commission's study on market-dominant rates.

Please direct any questions about the attached to me.

Stephen
--
Stephen Raher
General Counsel
Prison Policy Initiative
sraher@prisonpolicy.org
(413) 527-0845, ext. 316

PRISON
POLICY INITIATIVE

STEPHEN RAHER
General Counsel
(413) 527-0845 ext. 316
sraher@prisonpolicy.org

Headquarters:
PO Box 127
Northampton MA 01061

Direct address:
PO Box 15189
Portland OR 97293

www.prisonpolicy.org
www.prisonersofthecensus.org

July 29, 2022

Hon. Michael M. Kubayanda, Chairman
Postal Regulatory Commission
901 New York Ave., NW, Suite 200
Washington, DC 20268
VIA EMAIL (stakeholderinput@prc.gov)

Re: Rate Increases for Market-Dominant Products

Dear Chairman Kubayanda:

On behalf of the Prison Policy Initiative ("PPI"), I respectfully submit the following comments for the Commission's consideration in connection with its review of market-dominant rate and classification systems, as mandated by the Consolidated Appropriations Act of 2022 (the "Appropriations Act").[1]

PPI is a nonprofit organization that uses data analysis to demonstrate how the American system of incarceration negatively impacts everyone, not just incarcerated people. We have published numerous reports concerning communications options available to incarcerated people.[2] Our research reveals that financial exploitation is often built into communication-providers' business models. While the U.S. Postal Service has generally stood out as a universally accessible communications network that gives incarcerated people access to quality service at a reasonable price, recent hikes in postage rates, layered on top of sharply degraded service standards, have substantially reduced the value of First-Class Mail to all customers, particularly incarcerated users of the mail.

Because the Commission's review is expected to focus on recent ratemaking developments for market-dominant products, we begin with a discussion of incarcerated peoples' reliance on First-Class Mail, and then provide a brief overview of the financial hardships that high postage rates cause for incarcerated postal customers. We conclude with recommendations regarding actions that the Commission should take.

---

[1] *See* H. Rep. No. 117-79, at 100 (Jul. 1, 2021).
[2] Information about our general work on carceral communications can be found at https://www.prisonpolicy.org/communications.html. Postal-specific work is summarized at https://www.prisonpolicy.org/mail/.

I. Incarcerated People Are Uniquely Dependent on First-Class Mail

Approximately 2 million people are incarcerated in the United States on any given day, and the total number of people cycling through prison and jail each year exceeds 10 million (given the frequent churn of people in and out of local jails).[3] These millions of people represent a significant population that is uniquely sensitive to changes in postal rates and service standards, given a level of dependence on First-Class Mail that is unusual in modern life.

Mail is the primary channel by which people in prison and jail can conduct personal business. Incarcerated people must still use paper for basic activities that have migrated online for many segments of society—activities like filing tax returns (as hundreds of thousands of incarcerated people did recently to claim economic impact payments under the CARES Act[4]); submitting documents in judicial proceedings; monitoring credit reports for purposes of preventing identity theft; staying on top of personal finances;[5] and laying the groundwork for post-release jobs or educational programs.

Even more importantly, incarcerated people heavily rely on postal mail to maintain social connections with family and friends. Not only is this a leading example of our national postal policy in action (i.e., "to bind the Nation together through the personal . . . correspondence of the people"[6]), but it has significant societal benefits as well: mail plays a critical role in strengthening family ties, which in turn, is a key to reducing recidivism.[7]

Unlike most current postal customers, incarcerated mailers generally lack the ability to use alternative communications channels. Indeed, incarcerated people represent a rare group for whom Justice Holmes' observation still rings true: "the use of the mails is almost as much a part of free speech as the right to use our tongues."[8] People in prison and jail are unable to access to the internet[9] and do not have email. Even in correctional

---

[3] Wendy Sawyer & Peter Wagner, *Mass Incarceration: The Whole Pie 2022* (Mar. 14, 2022).
[4] *See* Stephen Raher, "Update: Court says IRS can't deny economic stimulus payments to incarcerated people," PPI Blog (Oct. 5, 2020).
[5] *See* *Collection at All Costs: Examining the Intersection of Mass Incarceration and the Student Debt Crisis* at 9-10 (Jul. 2022) (explaining communication difficulties incarcerated people face in trying to manage student loan debt); *Justice-Involved Individuals and the Consumer Financial Marketplace* at 22 (Jan. 2022) (difficulties managing consumer debt in general).
[6] 39 U.S.C. § 101(a).
[7] *See* Leah Wang, "Research roundup: The positive impacts of family contact for incarcerated people and their families," PPI Blog (Dec. 21, 2021) (reviewing studies quantifying the benefits of postal communication in maintaining family connections).
[8] *U.S. ex rel. Milwaukee Social Democratic Pub. Co. v. Burleson*, 255 U.S. 407, 437 (Holmes, J., dissenting).
[9] *See* Titia A. Holtz, *Reaching out from behind Bars: The Constitutionality of Laws Barring Prisoners from the Internet*, 67 Brook. L.Rev. 855 (2001-02).

facilities that have adopted electronic messaging systems, these systems are functionally inferior for many reasons, including the inability of users to attach documents or forward webpages.[10] Thus, if someone wants to send an incarcerated relative a tax form, a newspaper article, or a copy of a legal document, the only way to do so is through the mail. But increasing prices and slower delivery standards degrade the value proposition for these customers.

While most incarcerated people can make phone calls, they can only do so to a limited number of preapproved people, with almost all systems categorically prohibiting calls to toll-free telephone numbers.[11] In addition, phone calls can only be made to a small list of pre-approved numbers and rates range up to 50¢ per minute.[12]

II. Incarcerated People Have Little Ability to Earn Money and Wages for Incarcerated Workers Do Not Rise with the Consumer Price Index

In 2020, the Commission implemented a new ratemaking system that allows rates for market-dominant products to rise faster than the consumer price index.[13] But incarcerated peoples' earning power is severely limited to begin with, and does not come close to keeping pace with increases in inflation.

Jails, which typically house people for periods under a year, rarely have robust employment programs. Prisons do employ more incarcerated people,[14] but wages for these jobs are breathtakingly low. In 2017, PPI surveyed prison wages in all 50 states and discovered that wage scales for people incarcerated in state prison systems average 14¢ to 60¢ per hour for standard prison-based jobs.[15]

---

[10] *See generally*, Stephen Raher, *You've Got Mail: The Promise of Cyber Communication in Prisons and the Need for Regulation* (Jan. 21, 2016) (discussing benefits and drawbacks of electronic messaging systms in prisons); Stephen Raher, *The Company Store and the Literally Captive Market: Consumer Law in Prisons and Jails*, 17 Hastings Race & Poverty L.J. 3, 40-46 (2020) (discussing the lack of privacy protections as applied to electronic communications in correctional facilities).

[11] *See Annual Compliance Review, 2021*, PRC Dkt. No. ACR2021, Opening Comments of PPI at 2-3, n.10 (Mar. 1, 2022) (collecting prison policies prohibiting calls to toll-free numbers).

[12] *See generally*, PPI webpage: Regulating the prison phone industry, *available at* https://www.prisonpolicy.org/phones/.

[13] *Statutory Review of the System for Regulating Rates and Classes for Market Dominant Products*, PRC Dkt. No. RM 2017-3, Order Adopting Final Rules, Order No. 5763 (Nov. 30, 2020).

[14] Am. Civil Liberties Union & Univ. of Chicago Law School Global Human Rights Clinic, *Captive Labor: Exploitation of Incarcerated Workers* at 24-28 (2022) (finding that over 65% of people incarcerated in prisons work, predominantly in assignments maintaining the facilities in which they are housed).

[15] Wendy Sawyer, "How much do incarcerated people earn in each state?," PPI Blog (Apr. 10, 2017).

When researchers at the ACLU and the University of Chicago Law School conducted a similar survey in 2022, they reported virtually unchanged wages, with averages ranging from 13¢ to 52¢ per hour.[16] These shockingly low average figures mask substantial variation, with at least eight states paying nothing for standard jobs, and four states paying starting wages of 10¢ or less per hour. While no reliable research exists on the income of incarcerated peoples' families, one can infer that such relatives are more likely to be low-income based on the fact that incarcerated people are disproportionately likely to have low pre-incarceration incomes.[17]

III. The Commission Should Take Steps to Ease the Burdens Caused by High Rates for First-Class Mail

In requiring the Commission to solicit stakeholder input on market-dominant prices, Congress expressed particular concern about the ability of the Postal Service to precipitously raise rates under the rate system adopted in Order 5763.[18] In the nineteen months following the entry of Order 5763, single-piece letter rates have risen from 55¢ to 60¢, an increase of 8.3%.[19] As noted above, wages for incarcerated workers have not seen any material increase over the last five years.[20] The numerous incarcerated workers earning 10¢ an hour form a constituency of mailers who must work for *six hours* to afford the postage on a single letter home. At the same time postal rates are increasing, incarcerated mailers receive less value for their money, due to the degraded service standards for First-Class Mail.[21]

---

[16] *Captive Labor*, *supra* note 14 at 57-58. According to this report, a very small number of people (less than 7% of incarcerated workers) are employed in certified prison-industry programs. *Id.* at 27. Wages in these programs are only slightly higher, but also have not shown movement over time. PPI's 2017 survey revealed average certified-program wages of 33¢ to $1.41 per hour. The recent ACLU/University of Chicago report found averages of 30¢ to $1.30 per hour. *Id.* at 57-58.

[17] Bernadette Rabuy & Daniel Kopf, *Prisons of Poverty: Uncovering the Pre-Incarceration Incomes of the Imprisoned* (Jul. 2015) (finding median incomes of incarcerated men and women to be 52% and 42% (respectively) lower than those of non-incarcerated people).

[18] *See* H. Rep. No. 117-79, at 100 ("USPS has used this expanded authority [under Order 5763] to propose increasing certain postal rates effective August 20, 2021, by approximately 7 percent. The [House Appropriations] Committee is concerned with the size and timing of that rate increase.").

[19] *See* Rates for Domestic Letters Since 1863, *available at* https://about.usps.com/who/profile/history/domestic-letter-rates-since-1863.htm (last visited Jul. 25, 2022).

[20] *See supra*, notes 15 and 16 and accompanying text.

[21] *See First-Class Mail and Periodicals Service Standard Changes, 2021*, PRC Dkt. No. N2021-1, PPI Statement of Position at 3-8 (Jun. 15, 2021) (describing impacts of slower mail delivery on incarcerated mailers).

The Commission has at least two avenues for ameliorating the current financial burdens imposed on incarcerated ratepayers. First, the Commission can and should grant the pending petition for rulemaking in Docket Number RM2022-5.[22] As the petitioners in that proceeding have adeptly noted, many premises upon which the Commission relied when crafting Order 5763 have dramatically changed due to the passage of the Postal Service Reform Act of 2022.[23] The Postal Accountability and Enhancement Act of 2006 requires the Commission to review market-dominant rate-setting systems "as appropriate,"[24] and the changes brought about by the 2022 Reform Act make such a review appropriate at this time.

Second, in light of the important social benefits that come from facilitating communication between incarcerated people and their families, the Commission should recommend to Congress the creation of a special reduced rate for First-Class Mail sent by or to an incarcerated person. Throughout our nation's history, postal classifications have been driven in part by the "nature of mailers, their motivations, and the purposes behind the matter they mailed."[25] Given the societal challenges posed by mass incarceration and the beneficial impacts of postal communication, we encourage the Commission to support a proposal for such a new classification.

IV. Conclusion

PPI thanks the Commission for its work on this topic, and we appreciate the opportunity to provide feedback on behalf of the millions of incarcerated people in the U.S. As the Commission caries out its important role of overseeing the Postal Service and ensuring compliance with the law, PPI hopes you will keep in mind the unique needs of the many postal customers who rely on First-Class Mail to communicate across prison and jail walls.

Sincerely,

Stephen Raher

Stephen Raher
General Counsel

---

[22] *Petition for Rulemaking*, PRC Dkt. No. RM2022-5, Petition of Association for Postal Commerce and Alliance of Nonprofit Mailers (Apr. 11, 2022).
[23] *Petition for Rulemaking*, PRC Dkt. No. RM2022-5, Comments of PPI in Support of Petition for Rulemaking (May 13, 2022)
[24] 39 U.S.C. § 3622(d)(3).
[25] Richard B. Kieobowicz, *A History of Mail Classification and its Underlying Policies and Purposes* at 106 (Jul. 17, 1995, Postal Rate Comm'n Proc. MC95-1).

From:	Youth, Michael
To:	Stakeholder Input
Cc:	Duggan, Martha A.; Hotchkiss, Nelle; Bayless, Charlie; Kessler, Warren; Gates, Scott
Subject:	NC Electric Cooperatives Input re: PRC Study on USPS Rate Increases
Date:	Friday, July 29, 2022 10:43:08 AM
Attachments:	image001.png image002.png NCAEC Comments to PRC 07-2022 .pdf

Honorable Postal Regulatory Commission Commissioners,

Good morning.

Attached please find the North Carolina Association of Electric Cooperatives' (NCAEC) letter providing input to the PRC as it studies the size and timing of last year's postal rate increases.

In summary, NCAEC joins the National Rural Electric Association and the Alliance of Nonprofit Mailers in urging the Commission to revisit and significantly decrease recent rate increases.

Please contact me if you have any questions.

Sincerely,
Michael

Michael D. Youth
Government and Regulatory Affairs Counsel
NC Electric Cooperatives
3400 Sumner Blvd.
Raleigh, NC 27616
Email: michael.youth@ncemcs.com
Direct: 919-875-3060
Cell: 919-622-8135

CO-OPS VOTE
WWW.VOTE.COOP

We are committed to providing reliable, safe, and economical energy and related services, to operating as a cooperative business, and to continually improving services to meet the needs of our members and enhance their quality of life.

NC Electric Cooperatives
Your Touchstone Energy® Cooperatives

NC Electric Cooperatives
Your Touchstone Energy® Cooperatives

July 29, 2022

Chairman Michael M. Kubayanda
Vice Chairman Ann C. Fisher
Commissioner Mark Acton
Commissioner Ashley E. Poling
Commissioner Robert Taub

Postal Regulatory Commission
901 New York Avenue, NW, Suite 200
Washington, DC 20268
RE: Docket No. R2021-2

Submitted electronically

Dear Commissioners:

North Carolina Association of Electric Cooperatives (NCAEC) submits these comments in response to recent postal rate increases and the significant impacts they are having on rural North Carolina. **NCAEC joins the National Rural Electric Cooperative Association (NRECA) and the Alliance of Nonprofit Mailers in urging the Commission to revisit and significantly decrease recent rate increases.**

NCAEC represents the interests of North Carolina's 26 member-owned, not-for-profit, rural electric cooperatives. North Carolina's electric cooperatives collectively serve more than 2.5 million North Carolinians in 93 of the state's 100 counties. North Carolina's electric cooperatives utilize mail for many reasons, including distributing monthly bills and the monthly Carolina Country magazine to their members. Since 1946, Carolina Country has provided cooperative members with information that can help them make their homes more energy efficient, participate in cooperative energy management programs, and otherwise save money on their electric service. The magazine also provides critical governance information including, for example, how members can participate in electing directors to represent them on the cooperatives' boards of directors.

Many members prefer to receive their monthly bill by mail. Similarly, our research shows that a digital product simply cannot serve our members as well as a mailed physical magazine.[1]

[1] According to a 2022 MRI-Simmons survey, 78% of readers prefer to receive news about their co-op from Carolina Country magazine versus other forms of communication; 96% prefer to receive a printed copy of the magazine over a digital version.

Because mail remains such a critical component of our empowerment mission, we cannot avoid the cost associated with any increase in postage rates. And because cooperatives are not-for-profit and consumer-owned, they are forced to pass on the full cost of any postage rate increases to their members. The increased postage costs are negatively impacting North Carolina's electric cooperatives and their rural members, many of whom already face significant economic challenges.

For these reasons, NCAEC joins NRECA and the Alliance of Nonprofit Mailers in urging you to deny or significantly reduce further rate increases.

Thank you for your consideration.

Sincerely,

Michael Youth
Government and Regulatory Affairs Counsel
North Carolina Association of Electric Cooperatives
3400 Sumner Blvd.
Raleigh, North Carolina 27616
michael.youth@ncemcs.com

From:	William B. Baker
To:	Stakeholder Input
Cc:	Art Sackler
Subject:	Stakeholder Input
Date:	Friday, July 29, 2022 10:23:43 AM
Attachments:	NPPC-Stakeholder-FINAL.pdf

Attached please find the stakeholder input submitted by the National Postal Policy Council.

Please direct any questions to the undersigned.

Best regards.

William B. Baker | Partner | Potomac Law Group, PLLC
1300 Pennsylvania Avenue, NW, Suite 700
Washington, D.C. 20004
Tel: (571) 317-1922 | Fax: (202) 318-7707
wbaker@potomaclaw.com | www.potomaclaw.com

NPPC

National Postal Policy Council

July 29, 2022

Postal Regulatory Commission
901 New York Avenue, N.W.
Suite 200
Washington, D.C. 20268

Re: *Commission Study on Market-Dominant Rate Increases*

Dear Mr. Chairman and Members of the Commission:

The National Postal Policy Council respectfully submits these views in response to the Commission's May 26, 2022, invitation concerning the stakeholder consultation requested by Congress[1] on the Postal Service's August 2021 increases in the rates for market-dominant products and how the Covid-19 pandemic should affect the current system for regulating those rates.

Congress expressed concern about (1) "the size and timing" of the August 2021 rate increases and (2) that the review process conducted by the Commission pursuant to 39 U.S.C. §3622(d)(3) (in Docket No. RM2017-3) "did not account for the impact of the pandemic, including factors such as higher package revenues and emergency funding provided to the USPS."[1] House Report 117-79 directed the Commission to report to Congress on how those factors "should impact the rate proposed by the Postal Service" in August 2021 and the Commission's rules governing rates for Market Dominant prices adopted in November 2020.[2]

I. INTRODUCTION

The National Postal Policy Council is an association of large business users of letter mail, primarily First-Class Mail using the Automation rate category, with member companies from the telecommunications, banking and financial services, insurance, and mail services industries. NPPC members account for a large majority of the Presort Letters and Card (hereinafter "Presort Mail") in the postal system and work closely with the Postal Service on worksharing and many other efforts to make their mail as efficient

1 H. Rep. No. 117-79 at 100 (July 1, 2021).

2 *Id*.

1629 K Street, NW • Suite 300 • Washington, DC 20006
202-508-3687 • www.postalcouncil.org

and low cost as possible.   NPPC members also make substantial use of USPS Marketing Mail in their advertising campaigns and use Competitive products in the ordinary course of business.

II. THE COMMISSION'S ADOPTION OF THE REVISED SYSTEM FOR MARKET-DOMINANT RATES DID NOT TAKE THE PANDEMIC INTO ACCOUNT

The record shows that the Commission was well aware of the pandemic during the pendency of the later phases of the "10-year review" conducted as Docket No. RM2017-3. But the record also clearly shows the Commission decided that the pandemic did not disturb its principal findings, particularly those in Order No. 4257 regarding financial stability. And the Commission took little if any consideration of the pandemic's effects into account when fashioning its new system for regulating Market Dominant rates. This resulted in a flawed methodology. As a consequence, the Commission failed to anticipate the exorbitant Market Dominant rate increases that occurred in August 2021 and the effects of those increases on mailers of those products. The Commission should revise its methodology.

A. The Commission's Principal Decisions Were Made Before The Pandemic Occurred, And The Commission Did Not Revisit Them At Any Time Before Issuing Order No. 5763

Docket No. RM2017-3 commenced in December 2016, more than three years before Covid-19 emerged. The Commission's threshold determinations whether the regulatory system initially adopted under the PAEA had achieved the statutory objectives set forth in 39 U.S.C. §3622(b) were made on Dec. 1, 2017, more than two years before the pandemic began. *See* Order No. 4257.

Also on December 1, 2017, the Commission issued a Notice of Proposed Rulemaking proposing changes to the system for regulating Market Dominant rates. *See* Order No. 4258. On December 5, 2019, the Commission issued a Revised Notice of Proposed Rulemaking that, for the first time, proposed a density authority and a retirement authority, as well as revised versions of changes proposed previously. *See* Order No. 5337. These orders also predated the pandemic.

Comments were filed on the Revised NPRM by February 3, 2020, and the last round of (reply) comments were filed on March 10, 2020.

The Covid-19 national emergency was declared three days later. Neither the Orders in this proceeding nor the comments up to that point had addressed the potential implications of the pandemic.

But the pandemic quickly hit hard. And on March 23, 2020, a coalition of mailers jointly filed a motion to hold Docket No. RM2017-3 in abeyance during the national COVID emergency. *See Joint Motion To Hold Proceedings In Abeyance*, Docket No. RM2017-3 (Mar. 23, 2020).

In supporting comments, NPPC and others specifically noted that holding the proceeding in abeyance until the state of emergency was lifted would help ensure "that any order that the Commission may issue herein will reflect the circumstances that prevail after the emergency has ended." *Comments on Joint Motion To Hold Proceedings In Abeyance, and Request for Official Notice, Request for Issuance of Information Request, and Suggestion of Further Steps*, at 2. (March 30, 2020). Consistent with this request, NPPC *et al*. also asked the Commission to take official notice of the enactment of the CARES Act (H.R. 748) and to issue an information request to obtain "an understanding of the effects of the COVID-19 emergency on mail volumes." *Id*. at 3. However, the Commission quickly denied the joint motion and also denied the requests of NPPC *et al*. to take official notice of the CARES Act or to issue information requests. *See* Order No. 5469 (April 2, 2020).

Commenters offered the Commission another opportunity to take the extraordinary effects of the pandemic into account by moving for leave to file supplemental comments in July 2020. *See Supplemental Comments of MPA-the Association of Magazine Media, et al.* (July 2, 2020) (noting that the entire world had changed in the nearly four months since the comment period had closed). The MPA *et al*. supplemental comments asked the Commission to "consider the implications of the COVID-19 pandemic on the Postal Service and the enactment of the CARES Act" on the then-proposed new rate regulations.

In a similar set of supplemental comments filed shortly thereafter, NPPC and others noted that "the volume and revenue changes experienced by the Postal Service during the pandemic differ materially from the backdrop against which the Commission drafted the proposals in the *Revised NPRM*." *Supplemental Comments of the National Postal Policy Council et al*., at 1-2 (July 6, 2020). Those comments pointed out that those "volume and mix changes – and their revenue implications – during the COVID-19 pandemic constitute so substantial a changed circumstance that the Commission must reconsider its proposals." *Id*.

The Commission took no action on either set of the Supplemental comments. On November 30, 2020, nearly nine months after the pandemic-related national emergency was declared, the Commission revised the regulations governing Market Dominant rates, in particular authorizing the Postal Service to exceed the statutory price cap by means of a density factor, a retirement authority, a surcharge of non-compensatory classes, and making other changes to worksharing rules and procedures generally. *See* Order No. 5763. By that time the Commission was certainly aware that the pandemic was having a negative impact on Market Dominant volumes while spurring a substantial increase in Competitive product volumes and revenues.

But the Commission did not take those impacts into account in adopting the new system. When the Commission did address the pandemic, it repeatedly stated that the pandemic did not affect its findings in Order No. 4257. *E.g.*, Order No. 5763 at 26-31. Nor did the Commission take official notice of the enactment of the CARES Act, which made available $10 billion to the Postal Service to cover pandemic-related costs.

In sum, although the Commission was clearly well aware of the pandemic when it refashioned the market-dominant rate regulatory system, it took the position that the effects of the pandemic were uncertain and therefore did not reconsider or alter its earlier findings in Order No. 4257 and proposals in Order No. 5337. Instead, it stated merely that it would initiate a review of the revised rules in five years and would "monitor the effects of the final rules on the Postal Service and on mailers in light of economic developments, and it will intervene as necessary if economic conditions prevent the final rules from operating as intended to achieve the objectives of section 3622." Order No. 5763 at 31.

To date, it appears that this inquiry is the first attempt taken by the Commission to monitor the effects of the final rules on mailers.

B. The House Report Correctly Noted That The Commission Did Not Take Higher Package Revenues And The CARES Act Into Account

The House of Representatives expressed particular concern that the Docket No. RM2017-3 process did not take into account the higher packages revenues and emergency funding provided to the Postal Service.

1. The growth in packages

By the time Order No. 5763 was issued, the Commission was well aware that the pandemic was causing substantial growth in the Postal Service's Competitive packages volume. It was also aware of the steep decline in Market Dominant mail volume. However, the Commission did not address the implications of the growth in Competitive products and change in the mail mix on its proposals. In particular, the Commission did not consider the changing average revenue per piece in designing the new system.

2. The CARES Act

Not only did the Commission decline to take official notice of the $10 billion in funding provided by the CARES Act, but it declared that the CARES Act did "not impact" its analysis. Order No. 5763 at 29. The Commission said that the $10 billion was limited to short-term operating needs due to the pandemic, could not address other financial issues, and could only increase the Service's debt. *Id*. at 29-30. The Commission also said that the CARES Act funding did not address the Postal Service's then-accumulated losses. *Id*. at 30.

Congress effectively removed those limitations in December of 2020 by directing that the funding under the CARES Act did not have to be repaid, and could be used as general emergency relief by the Postal Service.[3]

---

[3] Consolidated Appropriations Act of 2021, P.L. 116-260.

III. THE SIZE AND TIMING OF THE AUGUST 2021 INCREASES WERE UNNECESSARY AND HARMFUL TO MAILERS AND THE FUTURE MAILSTREAM

A. The August 2021 Rate Increases Were Harmful To Mailers Currently And In The Future

The House Report's concern about the August 2021 rate increases was well-taken. Although the pandemic in fact improved the Postal Service's financial condition, the effects on mailers were quite different. And those effects were compounded by the August 2021 rate increases, which themselves were based on a mis-designed rate factor.

Business slowdowns and closings due to the pandemic reduced economic activity, and thus mail. This affected First-Class Mail (which declined at a quickened pace), Periodicals Mail (reflecting reduced circulation), and Marketing Mail (which fell precipitously in FY 2020). Never before did Market Dominant volumes fall so much. *FY20 Financial Analysis* at 6-7. As the pandemic persisted during calendar year 2021, it "exacerbated market dominant volume declines as activity in many sectors of the economy remained below pre-pandemic levels, although package volumes increased due to continued growth in e-commerce." *FY21 Financial Analysis* at 2.

Despite this two-year collapse in Market Dominant volumes driven by the pandemic and the ongoing struggles facing many businesses, the Postal Service nonetheless invoked all of the new rate authorities granted by the Commission in Docket No. RM2017-3 to impose in August 2021 rate increases on Market Dominant mail averaging 6.7 percent.[4]

A worse time to impose increases of more than 5 times the rate of inflation could scarcely be imagined. The 6.5 percent rate increase in August 2021 presented mail-dependent businesses that already were struggling with the pandemic with a very substantial price increase at a time when inflation was quite low. NPPC doubts that the full effects have yet become known, and the adverse effects will only compound as the Postal Service adds further increases on top of the previous increase.[5] The Postal Service again imposed above-inflation rate increases in July 2022, and postal management has indicated that it likely will do so again next time as well.

These effects on Market Dominant mail volume will deepen over time. As the Postal Service recognizes in its demand models, mailers (particularly in First-Class) may not react immediately to changes in postal rates. It "can take up to a year for the

---

4 Because these rates took effect with barely one month left in the fiscal year, their effect on postal finances was relatively small. *Annual Compliance Determination Fiscal Year 2021* at 64.

5 These rate increases were quickly followed by the Postal Service's reduction of service standards for the same Market Dominant products. As a result, mailers are now paying much more for service of less quality. This devaluation of First-Class Mail will cause still more harm to mailers.

full effect of changes in Postal Rates to influence mail volumes." *USPS Demand Narrative*, at 30 (July 1, 2022).

The experience of NPPC members is consistent with the Postal Service's demand narrative. As large business operations, NPPC members do not shift mail to other channels quickly. And steep rate increases and the prospect of still more in the future tend to cause business mailers to shift their investments and future efforts away from mail. Once shifted, those communications stay shifted.

Yet, to NPPC's knowledge, neither the Postal Service nor the Commission has inquired (until now) into the impact of these increases on mailers captive to the postal monopoly.[6]

B. The August 2021 Rate Increases Were Unnecessarily Caused By A Flawed Factor

The August 2021 increases were unnecessary. By far the largest factor driving the size of the August 2021 increases was a density factor of 4.5 percent. And the biggest reason driving that size of the factor was a failure by the Commission to take the change in the mail mix caused by the pandemic, and the resulting per-piece contribution, into account.

The density factor purports to compensate the Postal Service for lost per-unit contribution to institutional costs due to volume declines.[7] However, it does so very crudely because the factor ignores the actual per-unit contributions made by the mail volumes in the system. The ultimate point is to enable the Service to collect sufficient revenues to cover increasing per-unit costs. Even if such a factor were necessary to improve the Service's financial condition, taking into account the revenue generated by the different types of mail in the system would do so far more directly.

Indeed, had the Commission taken the actual experience of the pandemic into account, it would have had to recognize that the significantly higher per-piece rates and contribution of Competitive products completely offset the reduced revenue and contribution from the substantially lower markup Market Dominant mail in both FY 2021 and FY 2022, thus fully addressing the purported need to recover "higher-per-unit-cost" as total volumes decline. That could have entirely avoided the portion of the August 2021 increase caused by the density factor.

Nowhere in Docket No. RM2017-3 did the Commission acknowledge that the pandemic might cause the density factor to approach anything near 4.5 percent.

---

[6] Although technically the increases are the responsibility of the Governors of the Postal Service, the Postal Service could impose such increases only if the Commission allowed.

[7] In Order No. 5763 (at 29), the Commission stated that, due to the pandemic, "there are fewer total mailpieces today over which the costs of servicing and maintaining the Postal Service's network can be distributed, which causes the per-unit cost of delivering the remaining mailpieces to increase."

Indeed, in both Order No. 5337 (which proposed the density factor) and Order No. 5763 (which adopted the density factor), the Commission included a table presenting what the density factor would have been from 2013 through 2019. *See* Order No. 5337 at Table IV-3 & Order No. 5763, Appendix B, Table A-1. That showed that the density factor typically ranged around 1 percent over that period, with the biggest in any of those years being 2.69 percent in 2013. As far as NPPC is aware, the Commission has not addressed the wide disparity between its predictions and the actual results.[8] That the density factor proved to be unpredictable in its very first test is evidence of its harmfulness and its failure to produce stable rates.[9]

IV. CONSIDERATION OF THE GROWTH IN PACKAGES AND THE CARES ACT, PLUS THE MORE RECENT POSTAL SERVICE REFORM ACT, REQUIRES RECONSIDERATION OF THE NEW RATE SYSTEM FOR REGULATING MARKET DOMINANT RATES

The House Report directs the Commission to report on how the growth in packages and the CARES Act should affect the Market Dominant rate increases that occurred in August 2021. NPPC urges the Commission also to include in its report to Congress on the effects of the enactment of the Postal Service Reform Act[10] and the further rate increases in July 2022.

Most importantly, the Commission should report that the failure to take the effects of the pandemic and legislation into account has led to accelerated and unnecessary volume losses in Market Dominant mail that, when coupled with the substantial reduction in Postal Service liabilities enacted by the PSRA, require revision to what is currently a counterproductive rate system.

First, it is important to recognize that the pandemic had a positive effect on the Postal Service's finances even without the increases authorized by the new rate

---

[8] Mailers, however, quickly recognized that the combination of the pandemic and the density factor would be unpredictable. On March 3, 2020, a coalition of mailers jointly filed a motion to hold Docket No. RM2017-3 in abeyance pending an evaluation of how the price changes contemplated by Order No. 5337 would affect mail volumes. See *Petition of the American Mail Alliance For Initiation Of A Public Inquiry and For Suspension Of Statutory Review*, Docket No. RM2017-3. As noted above, the Commission promptly denied that motion.

[9] When an agency is confronted with evidence that the factual premises underlying its prior judgment have eroded, "it must offer more to justify its decision to retain its regulations than mere conclusory statements." *Environmental Health Trust v. Federal Communications Commission*, 9 F.4th 893, 903 (D.C. Cir. 2021) (citations omitted). Mailers have long been concerned about unpredictable rate increases. Indeed, mailers' frustration with unpredictable rate increases under the former Postal Reorganization Act was a major reason why mailers supported the 2006 Postal Accountability and Enhancement Act.

[10] Indeed, the House Report for the Fiscal Year 2023 Financial Services and General Government bill, H.R. 8254, urges the Commission to consider the changes enacted in the PSRA. H. Rpt. 117-393 at 100. The Senate has yet to act, but it will likely agree with the House, given that the PSRA is law.

system. The Postal Service's revenue and net operating income both exceeded its Integrated Financial Plan in both 2020[11] and 2021,[12] and the CARES Act improved its cash on hand. The recent PSRA has eliminated the retiree health benefit liabilities that in the past had so distorted the balance sheet.

The basic reasons for this better-than-plan financial performance were the same in both years. The Postal Service enjoyed unprecedented growth in Competitive product volume and revenue as shoppers increasingly opted for e-commerce while the volume and revenues from much lower margin Market Dominant products (particularly in Marketing Mail) fell compared to pre-pandemic levels. *Financial Analysis of United States Postal Service Financial Results and 10-K Statement*, *Fiscal Year 2021*, Table II-2 (April 26, 2021). *FY21 Financial Analysis*, Table II-2.

The Postal Service's ability to meet or exceed its Integrated Financial Plan in Fiscal Years 2020 and 2021 is a tribute to its multi-product offerings. The Postal Service's bottom line was well protected from the pandemic as its volume mix shifted away from high volume/low markup Market Dominant products to high markup/lower-but-growing volume Competitive products. If anything, the Postal Service emerged from the pandemic with a valuable multi-product set of offerings.

Second, the failure to take into account fundamentally important developments – a national pandemic, a drastic change in mail mix, and postal legislation – strongly suggests that the resulting decisions are not well-designed for the future. And while Order No. 5763 could not have taken into account the Postal Service Reform Act, enacted only this year, that law directly addresses the leading cause of what the Commission found in Order No. 4257 to be the USPS's "unstable" financial condition.

The Commission has a responsibility to take the PSRA into account. See *National Cable & Telecommunications Association v. Brand X Internet Services*, 565 U.S. 967, 981 (2005) (stating that an agency "must consider . . . the wisdom of its policy on a continuing basis . . . for example, in response to changed factual circumstances" [citations omitted]); *Van Hollen, Jr. V. Federal Election Commission*, 811 F.3 486, 496 (D.C. Cir. 2016) (same). Two separate joint mailer petitions currently pending before

---

11 As the Commission found over a year ago, the Service's operating revenue in FY 2020 of $73.3 billion exceeded the IFP by $1.5 billion and the previous year's revenue by $2.0 billion. *Financial Analysis of United States Postal Service Financial Results and 10-K Statement, Fiscal Year 2020.* at 6 (April 26, 2021).

12 In FY 2021, despite the first half of the fiscal year occurring during a pandemic surge, the Postal Service recorded operating revenue of $3.9 billion more than in FY 2020, easily offsetting a $3.0 billion increase in operating expenses. The Service's net income from operations was a positive $3.3 billion, an astonishing $8.6 billion more favorable result compared to its IFP. FY21 Financial Analysis at 6. And the Postal Service's cash position increased by $5.6 billion. *Id*. at 7.

the Commission in Dockets Nos. RM2022-5 and RM2022-6 provide the Commission with an opportunity to carry out its obligation.[13]

NPPC urges the Commission to report that it is undertaking a review of its new system, as urged by those petitions, with an intention to revise it to take into account the current postal financial environment.

V. CONCLUSION

The National Postal Policy Council appreciates this opportunity to express the views of its members, which are all valued stakeholders in the nation's postal system. The failure to take the pandemic into account, and the harmful effects of that omission, require revision to the current system.

Respectfully submitted,
NATIONAL POSTAL POLICY COUNCIL

Arthur B. Sackler
Executive Director
1629 K Street, N.W.
Suite 300
Washington DC 20066
(202) 508-3687
asackler@postalcouncil.org

William B. Baker
POTOMAC LAW GROUP, PLLC
1300 Pennsylvania Avenue, N.W.
Suite 700
Washington, DC 20004
(571) 317-1922
wbaker@potomaclaw.com

---

[13] Where a fundamental change in the factual premises previously considered by an agency has occurred, the agency has a responsibility to engage in a new rulemaking. *See Flyers Rights Education Fund, Inc. v. Federal Aviation Administration*, 864 F.3d 738, 743 (D.C. Cir. 2017)

From: Donna Hanbery
To: Stakeholder Input
Subject: Response to Request for Stakeholder consultation
Date: Friday, July 29, 2022 10:09:34 AM
Attachments: PRC Comments.pdf

Dear Commissioners and staff:

Please see attached.

We appreciate this opportunity to comment and hope the PRC will take this opportunity to revisit the current 2X a year rate making environment and its impact on mailers and stakeholders.

Donna Hanbery, Executive Director
Saturation Mailers Coalition (SMC)
33 South 6th Street
Suite 4160
Minneapolis, MN 55424

DD 612-340-9350
Fax 612-340-9446

Saturation Mailers Coalition

Donna E. Hanbery, Executive Director
33 South Sixth Street, Suite 4160
Minneapolis, MN 55402
(612) 340-9350 Direct Line
(612) 340-9446 Fax
HANBERY@HNCLAW.COM

July 28, 2022

Postal Regulatory Commission
901 New York Ave. NW., Suite 200
Washington DC 20268

BY FIRST-CLASS MAIL AND EMAIL TO
STAKEHOLDERINPUT@PRC.GOV

RESPONSE TO REQUEST FOR STAKEHOLDER CONSULTATION

Dear Postal Regulatory Commission:

I am writing on behalf of the Saturation Mailer Coalition and our members that produce, print, and enter saturation shared mail advertising programs with the USPS. We are grateful that Congress has requested the Commission to consider the impact that the new pricing rules have had on mailers and to consider the substantial changes that have occurred between the years when the Commission was conducting the ten year rate review proceedings and today's mailing, printing, and advertising environment.

Being blunt, the Postal Service's financial health and prospects have improved while the future and survival of the Saturation Shared Mail advertising industry has declined. As mailers that devote our business lives to promoting and building advertising programs that are sent by the U.S. mail, we cherish and share a desire to maintain and promote the survival of a healthy Postal Service. But the additional pricing flexibility of the density adder has perversely punished mailers with higher rates for mail losses that potentially could have been avoided by the Postal Service. It has created greater pressures for price sensitive, competitive types of mail like saturation shared mail to leave the USPS. The density adder makes things worse with each price adjustment.

The print mail industry, particularly the Saturation Shared Mail industry where mailers commit to a mailing program with the USPS on a weekly/monthly basis, in the form of shared mail wraps, free paper or shoppers, coupon magazine and envelope programs is very price sensitive. Advertising customers are choosing between the mail and other forms of advertising media. The recent rate regulation allowing much higher than inflation, twice a year, price increases have caused many SMC members to permanently close advertising programs and markets, to reduce volumes, and to convert all or portions of their shared mail programs to alternate forms of distribution (i.e. private carrier delivery rack or demand distribution where pieces are placed in racks in stores, and digital).

For decades we supported and sought Postal Reform and relief from the unreasonable pre-funding burdens that unfairly painted the Postal Service as a dying business awash in red ink. From our standpoint, the PRC regrettably failed to recognize this as a legislative problem. In its misguided conclusion that it (not Congress) needed to help the Postal Service make ends meet, the PRC placed the financial problems of the Postal Service, including the artificial ones created by Congress, on the backs of rate paying Market Dominant customers.

Clearly mailing and marketing habits are changing. The previous role of Market Dominant first-class mail as the financial foundation for the Postal Service's costs of doing business is gone. But the growth of package services, as a higher revenue generator, and the potential for marketing mail to be a stable or growing mail class has, as is noted in the House of Representative's statement, been enhanced by changing shopping habits and Covid.

We are aware that other mailers and organizations have petitioned the PRC to revisit the ratemaking rules sooner rather than later. After years of protracted litigation where virtually every mailer has opposed the PRC's regulations as not protecting Market Dominant mailers, and not reflecting the current financial and regulatory conditions of the Postal Service, the Congressional invitation to today's environment invites the opening of a docket for reconsideration.

Speaking solely for our members, we want to be Postal Service customers. Many of our member companies have worked for generations to build shared mail programs where advertisers ranging in size from national concerns to local mom-and-pop businesses wanting to send a print advertisement, circular, or coupon, to an entire market or single carrier route have worked in partnership with the Postal Service. But today's rate environment with twice a year rate hikes and the density adder has led to rate increases exceeding today's out-of-control inflation. This is pushing mail volumes out of the system. Even the most loyal mail customers have needed to reduce or eliminate frequency or geography from their mail programs.

Our shared mail members have not been able to increase their advertising rates to pay for ever higher postal costs and paper prices. Back-to-back postal increases have frequently been absorbed by mailers as advertisers have been reluctant or unwilling to spend more to advertise. In the face of supply chain uncertainty, higher prices of goods, and reduced consumer demand, advertisers are not increasing advertising budgets. One of the side effects of the Covid shutdown was that many shared mail advertisers (groceries, retailers, fast food and service businesses), either had more customers than they could handle, or were out of business due to shutdowns and business interruption.

Between 2020 and today, SMC members have reduced mail volumes by 25% to one-third. But the industry could have recovered. Just as Covid was ending and shared mailers were trying to recover, the Postal Service had the additional rate authority of the density adder punishing mailers again with the consequences of Covid. SMC members believe that the mail volumes we are cutting today, and in recent years, is due largely to the PRC new rate-making regime. Our members need to tell advertising customers, with little or no reliability or predictability, that their postal rates will increase twice a year and that the increases will certainly be greater than the cumulative impact of inflation. This rate environment is leading to the continuous loss of saturation shared mail volumes that used to be high mark-up, high contribution, marketing mail brought largely to DDUs on a predictable, known frequency, where the mailer and local post offices could coordinate transportation and staffing needs.

We love the Postal Service and want it to succeed. Mailers and the USPS would do better with an approach to pricing that focused more on today's Postal Service and its current and potential mail mix. Things that are hurting USPS mail include:

- The density adder is a mail destroyer. Raising prices to compensate for lost mail does not make sense. The PRC's conclusion that all lost mail is out of the Postal Service's control should be revisited. Virtually every mailer agrees this was a perverse and punishing consequence of the new rules.
- Increasing prices twice a year is a recipe for losing business. Every time our mailers or advertising customers hear about postal rates going up, it is a reason for advertisers with media choices to change their media mix and reduce or leave the mail. The PAEA goals of certainty and reliability should require no more frequent than annual price adjustments, absent extraordinary circumstances.
- The PRC should be more flexible to developing and working with the Postal Service and market dominant customers on new ways to approach ratemaking and pricing that are more holistic and less focused on Postal Service costs, operations, and work-sharing. Opportunities to grow volume, frequency, and to focus on unique mailing products should be encouraged. Going back to 1990 when shared mailers were seeking a separate classification for saturation shared mail programs, efforts to create rate designs that differ by product type, including a rate model that is customized for high-volume stated frequency price sensitive shared mail advertising, as opposed to treating ECR saturation mail as just one end of the USPS operations and entry continuum of marketing mail, has been an SMC goal for decades.

As the regulator charged with protecting stakeholders and the Postal Service alike, we ask that the PRC take this opportunity to revisit the rules governing prices and rates in light of changed legislative, USPS financial and market environment.

Respectfully submitted,

Donna Hanbery /lmk

Donna Hanbery
Executive Director, Saturation Mailers Coalition

From:	Senny Boone
To:	Stakeholder Input
Subject:	ANA & ANA Nonprofit Federation Letter 7.29.22
Date:	Friday, July 29, 2022 9:58:19 AM
Attachments:	image001.png ANA Letter Postal Regulatory Commission 7.29.22.docx

---

Dear Postal Regulatory Commission:

I attach the letter regarding stakeholder comments on behalf of the ANA and the ANA Nonprofit Federation.

Please let me know if you need additional information & thank you for your review.

Best regards,

Xenia "Senny" Boone, Esq.
SVP, ANA Nonprofit Federation & Center for Ethical Marketing
2020 K Street, NW, Suite 660, Washington DC 20006
Office (202)861-2498, Mobile (202)297-9734

ANA

July 29, 2022

Postal Regulatory Commission

901 New York Avenue NW, Suite 200

Washington, DC 20268-0001

Via email: Stakeholderinput@prc.gov

Dear Postal Regulatory Commissioners:

These comments are submitted on behalf of the Association of National Advertisers (ANA) and the ANA's Nonprofit Federation (ANA NF) in response to the recent request by the Postal Regulatory Commission (PRC) for stakeholder input regarding rates and the rate-setting process, as required by Congress.[1] As key postal stakeholders, we appreciate the opportunity to submit comments during a challenging economic period for the mailing community. For the reasons outlined in this letter, we urge you to reconsider the two rate flexible mechanisms you provided (i.e., density and offset of the prefunded future retiree liability formulas) to the United States Postal Service (USPS) in November 2020 and instead to reinstate the previous CPI rate-setting mechanism.

The ANA's mission is to drive growth for marketing professionals, brands and businesses, the industry, and humanity. The ANA serves the marketing needs of 20,000 brands by leveraging the 12-point ANA Growth Agenda, which has been endorsed by the Global CMO Growth Council. The ANA's membership consists of U.S. and international companies, including client-side marketers, nonprofits, fundraisers, and marketing solutions providers (data science and technology companies, ad agencies, publishers, media companies, suppliers, and vendors). The ANA creates Marketing Growth Champions by serving, educating, and advocating for more than 50,000 industry members that collectively invest more than $400 billion in marketing and advertising annually.

The ANA NF, an organization established in 1982, brings nonprofit organizations and the marketing community together as a catalyst for change. The ANA NF has continuously provided top-quality fundraising education, advocacy, sponsorship and ethical standards for the nonprofit data-driven fundraising community. It represents over 200 nonprofit organizations and 50 agencies that work on their behalf to advance missions and help raise over $450 billion in donations each year.

The USPS is a critically important government agency that serves our members and reaches every household six days a week. We have long been concerned about the health of the USPS

[1] Joint Explanatory Statement, Division E—Financial Services and General Government Appropriations Act, 2022, at 49, 162 Cong. Rec. H1709, H2356 (daily ed. Mar. 9, 2022).

due to the societal shift from paper-based to digital communications, which offer low-cost and immediate delivery. Despite this challenge, mail remains a strong communications channel for ANA's and the ANA NF's commercial and nonprofit members. In fact, in the 2021 ANA Response Rate Report[2], 38% of the respondents reported using direct mail as part of their marketing mix with an excellent return on investment of 112%. Marketing mail continues to be a key factor in planning future campaigns, whether for products and services, small business offers, packages, or nonprofit outreach and fundraising solicitations that support missions across America and internationally.

Marketers and fundraisers count on the USPS (the vital national communications channel and provider of marketing mail and the nonprofit subclasses) to deliver a stable set of postal services at affordable rates. Marketers' and fundraisers' reliance on the USPS is critical to budget planning and dependable delivery of mail and packages.

For years, the mailing community supported the current rate-setting approach in the postal reform law (the Postal Accountability and Enhancement Act) because it afforded a sound and predictable rate process instead of past postal rate cases that had caused instability and uncertainty for mail customers. Now, however, the outlook for mail customers is more uncertain and complex. Without the PRC's active engagement, the USPS' needed positive business growth will stall, as its customers turn to digital as a less expensive and more effective alternative and/or reduce their spending.

These recent actions are a cause of great concern to our members:

- In November 2020, the PRC changed the rate-setting process based on the 10-year rate review process to add 2 mechanisms (the density-driven formula and offset of the prefunded future retiree liability formula) allowing the USPS more flexibility in setting its rates. *This change has led to increased rates.*
- Postmaster General DeJoy's recent 10-year plan (Delivering for America) seeks to close a funding gap of $160 billion by increasing rates multiple times on mailers and relaxing mail delivery service standards.[3] *This plan ensures that future mail customers have no other options but to pay more for less.*

These actions were taken even though Congress, to assist the USPS and its customers, provided $10 billion in funding from an emergency relief fund to help alleviate USPS costs during the COVID-19 pandemic. Later, Congress passed a new law (the Postal Reform Act of 2022) that removes the prefunding requirement for retiree health benefits. The significant majority of the losses USPS incurred were accounting losses due to the prefunding requirement. These actions

[2] This ANA report highlights benchmark performance and cost data across direct marketing channels, including direct mail, digital display, e-mail and social media.

[3] https://www.linns.com/news/postal-updates/pmg-dejoy-declares-usps-rate-increases-will-continue

have led to improved finances for the USPS, and possibly more importantly, removed a major concern in the PRC 10-year rate review changes.

ANA's and ANA NF's members, as well as others, have been asked to pay more in a significant way for the past 18 months. The increase can be almost 20% based on the type of mail category used by the mailer, and the heightened rate is partially a result of the PRC's decision in 2020 to grant new rate flexibility to the USPS when its outlook was far worse than it is today. The USPS – with the approval of the PRC -- just raised rates again in July and intends to continue raising rates twice each year.

The increases in rates for mailers can be as high as 60%, posing difficulties for charities who are without many alternatives. In short, the USPS is asking its customers to fund its services at a higher rate while reducing those services pursuant to its strategic plan. Clearly, this is not an acceptable request.

Mailers such as ANA's and ANA NF's members cannot foresee an end to rate increases, and so must consider other options if this plan is not changed. Our members recently responded to an informational survey by ANA's Postal Advisory Council seeking input on the impacts of the postal rate increase and reported the following significant effects:

> -Nearly 90% of respondents have been impacted by postal rate increases, paper shortages and paper price increases.
>
> -As a result, 30% are planning fewer mailings.
>
> -45% are planning to limit the volume and reach of the mailings.
>
> -27% are shifting more budget to digital.

Undoubtedly, the PRC's role as an independent agency that provides rate-setting review authority, transparency and accountability for the USPS is critically important. We seek a reasonable approach to rate-setting that will not further accelerate the reduction in postal volume caused by the shift to digital communications. Rather than nonstop rate increases, a more reasonable approach would allow the strategies and planning to succeed while providing a more steadied approach for mail customers.

We urge the PRC to reconsider the flexible rate mechanisms provided to the USPS in 2020 and, with the retiree health benefit prefunding requirement eliminated, to reinstate the CPI rate-setting mechanism that previously worked so well.

We appreciate the opportunity to provide these comments during the stakeholder input process and urge you to review and consider proactive steps to revise the rate-setting mechanism to alleviate the looming mail crisis that will prove so devastating for ANA's and ANA NF's members and others who rely on postal services for marketing activities.

Thank you for your review and consideration.

Respectfully submitted,

Christopher Oswald, ANA EVP Government Affairs

Xenia “Senny” Boone, ANA SVP ANA Nonprofit Federation

From:	Mindy McClellan
To:	Stakeholder Input
Subject:	Stakeholder Comments
Date:	Friday, July 29, 2022 8:28:08 AM
Attachments:	Discover Comments on USPS Rate Case July 2022.pdf

Pursuant to the Commission's request for stakeholder views, Discover Financial Services respectfully submits the attached comments.

July 28, 2022

Discover Financial Services(Discover) thanks the Commission for the opportunity to provide our point of view regarding the impact more than one direct mail postal rate increase per year can have on mailers, especially when tied to the additional rate authority the Commission granted the Postal service after its review of PAEA.

Discover would like to address how Commission rules authorizing multiple increases per year and the additional rate authority created after the ten-year review compounded an already difficult environment. In light of recent legislation improving the USPS outlook, are two increases needed? We are invested in the success of the USPS, but increased rates after budgets are already in place will, result in reduced volumes. As this effect spreads throughout the industry, these reduced volumes will grow the density adder, which further compounds the problems the next increase will cause.

Postal rate increases compound extreme macro (pandemic, war, inflation) and microenvironment (paper supply-chain, logistics, fuel surcharges, labor shortage) impacts affecting the direct mail channel which, if not promptly addressed, will push direct mail to extinction, causing an existential threat to the USPS, and enormous challenges to those companies that rely on direct mail like Discover. There is tremendous marketing pressure driving digital communication. As the cost to acquire a new customer leveraging direct mail continues to soar, the cost per acquisition narrows, and the propensity for digital communication increases.

Many Fortune 500 companies like Discover begin their fiscal year in January each year. It is significantly easier to level set marketing expectations and establish accurate forecasts when postal increases are annual – and particularly when those increases become effective in January and align with our fiscal year. Bi-annual rate increases are not only challenging to manage, but impossible to forecast, especially during times of dynamic inflation. As a result, when the current second rate increase takes effect, marketing mail volumes will decline due to budget impact. This is tragic and detrimental to the channel.

In addition, the multiplier effect results in fewer new accounts, which reduces the number of statements and results in fewer marketing offers, fewer plastics, etc.

Discover is not the only company impacted this way; this experience will be common to any business that depends on the mail. As companies drop mail marketing campaigns, switch to electronic channels, and enroll fewer new customers served by mail, the Postal Service will only gain more rate authority through the density adder. While no panacea, the recent legislation has significantly reduced the Postal Service’s overall revenue needs. At some point, the incremental benefit to the Postal Service by providing it more rate authority through the density adder will be outweighed by the direct harm mailers experience from massive, bi-annual rate increases. As this balance of benefits shifts, it will perpetuate the decline of the direct mail channel.

Discover urges the Commission to direct the USPS to plan, communicate, and limit any new rate changes to once per annum, with adequate advance notice to companies affected by the increases, and ensure that the effective dates of increases allow companies to plan and budget for those increases, aligned with the start of the majority of their fiscal years.

Respectfully,

Discover Financial Services

2500 Lake Cook Road

Riverwoods IL 60015

From: David Stover
To: Stakeholder Input
Subject: Stakeholder Input from Greeting Card Association
Date: Friday, July 29, 2022 7:05:29 AM
Attachments: GCA Comments.pdf
GCA comments 2020 HDS Volume Trends Exh1.pdf
GCA comments Exh 2 cover.pdf
GCA comment Exh 2 RM2022-6 Joint Petition.pdf

Attached are four files comprising the stakeholder input, responsive to the Commission's May 26 invitation, of the Greeting Card Association. The four files are:

1. *Comments of the Greeting Card Association,* a .pdf file (8 pages)
2. Exhibit I, a .pdf file comprising a one-page chart
3. Exhibit II, a .pdf one-page cover sheet
4. Exhibit II, a copy of the petition in Docket No. RM2022-6.

Please assemble these files in the order shown above. Thank you.

David F. Stover
Counsel for the Greeting Card Association

COMMENTS OF THE GREETING CARD ASSOCIATION

Pursuant to the Commission's announcement of May 26, 2022, which responded to House Report 117-79, the Greeting Card Association (GCA) here provides the requested input. GCA, which comprises about 200 greeting card publishers and other greeting card industry stakeholder companies, is the postal trade association which speaks for that industry as well as for the citizen mailer. A number of significant issues are before the Commission, and the House Report identifies many of them.

<u>The deleterious effects of excessive, sudden price increases</u>

The House Report calls attention to the "size and timing" of the price increases enabled by the Commission's final rules in the tenth-year review (Docket RM2017-3, authorized by 39 U.S.C. 3622(d)(3)). Those increases are a prime example of our concern, but not the only ones. They do, however, furnish adequate reasons why the Commission should accept the two petitions before it in Dockets RM 2022-5 and RM2022-6, and conduct its sec. 3622(d)(3) process over again.

Both businesses and the general public are capable of dealing with relatively moderate increases in the price of necessities, even if they occur every year. The effect of excessively large increases, and especially those which are "out of line" with the previous course of prices for the product involved, should be a serious concern for the Postal Service and the Commission. Here are some examples:

In the second quarter of FY 2019, the price for the first ounce of a Single-Piece First-Class Letter was raised ten percent, from $0.50 to $0.55. This was a materially greater increase than had taken place for that product in past years. In percentage terms, it was the largest increase of the PAEA era, and indeed the largest since 1995. If we exclude the 2014 exigency increase, it was more than twice the size of any other PAEA-era increase. In absolute numbers (cents) it was the largest increase in the 52 years of Postal Reorganization.

And this drastic increase had a visible effect. Using Postal Service data from the *Household Diary Study,* we found that in FY 2020 the volume of holiday greeting cards sent by households fell by 45.8 percent – from 1.170 billion the previous year to 634 million.[1] The *Household*

[1] GCA uses *Household Diary Study* data to track, inter alia, the volume of household holiday greeting cards. Our current tracking chart contains data back to FY 2008, and shows that, in absolute numbers, the FY 2019-FY2020

Diary Study provides only annual figures. But holiday greeting cards are significantly concentrated in the first postal quarter, i.e., October through December of 2019 – in other words, the first December-holiday card-sending period after the ten-percent increase in postage cost.

More recently, the non-machinable surcharge for Single-Piece letters was raised 50 percent, from \$0.20 to \$0.30 (Docket No. R2021-2) and still more recently (RM2022-1) by another 30 percent, from \$0.30 to \$0.39. After the 50-percent increase, the proportion of stamped letters paying the non-machinable surcharge fell by a third.[2]

These are examples of what we have seen happen *after* an abnormal rate increase. A further problem is that such effects are harder to foresee. Most economists would suspect that a volume-forecasting model capable of performing adequately when prices increase two or three percent cannot be relied on when increases are much larger. Own-price elasticity can change if price changes are large. It is not uncommon for a post-price-change alteration in customer behavior to be ascribed to "rate shock" – which is, at bottom, simply a perhaps unanticipated reaction to an unanticipated price increase.

The PAEA calls for, inter alia, "predictability and stability in rates" (39 USC 3622(b)(2)). A rate which rises drastically after a history of relative stability is clearly not stable. A rate increase which calls in question the ability of the commonly-used forecasting model to show its effect is not predictable, at least from the customer's viewpoint: prices do not exist in a vacuum but are important for how they can be expected to affect the choices made by those who must pay them. Households as well as businesses value stability and predictability in what they pay for necessities. The Commission should recognize the importance of these values to everyone in the mailing community. In Order 4257, the Commission interpreted objective (b)(2) very similarly:

> . . . Objective 2 contains a "timing" component and a "magnitude" component to determine whether the system has fostered rates, "including prices for all market dominant products and promotions, that are capable of being consistently forecast with regard to timing and magnitude and that do not include sudden or extreme fluctuations." [[3]]

---

decline was about two-thirds greater than any previous decline (and we would note that some of the year-to-year changes in the chart were increases not declines).

[2] This decline was calculated using Postal Service Billing Determinants data.

[3] Order 4257, p. 46 (fn. omitted). The language in quotation marks is from the advance notice of proposed rulemaking, Order 3673. We would note that the House Report expressed concern with the "size and timing" of the anticipated increases.

It is quite true that another objective of the statute confers pricing flexibility on the Postal Service, and that the objective mandating a just and reasonable rate schedule allows for differing increases within a class. But as the Commission often states, the task is to balance the objectives, applying them in conjunction with one another. Stability and predictability, in GCA's view, and as the examples above suggest, have too often been left out of account in this balancing process.

Diversity of Single-Piece First-Class Letters

First Class has always been the "anything mailable" class. Though there is a weight limit for letters, the uses to which the mailer may put the letter product are essentially unlimited. The Postal Service, for cost and operational purposes, treats Single-Piece Letters as a single product, albeit in recent years with two different first-ounce rate cells for Stamped and Metered Letters, respectively. In GCA's view, it is important for both the Postal Service and the Commission to recognize the diverse ways in which this product is used.

Again using *Household Diary Study* data, GCA has found that of household-origin letters only slightly more than half are bill payments. (The proportion of bill payments has declined steadily and substantially in the last fifteen years. In FY 2008, bill payments outnumbered the personal correspondence items which GCA tracks, by more than two and a quarter to one.) Nearly half of that mail – 2.345 billion pieces in FY 2020 – comprised personal correspondence[4], and of this nearly two-thirds (1.559 billion pieces) consisted of greeting cards. But there are significant differences in mail characteristics between personal correspondence and bill payments.

A typical household bill payment piece comprises a check and a payment slip. The bill sender commonly includes a machinable return envelope, and when the household must use an envelope of its own, one would normally expect it to be machinable. It would be hard to find a bill payment weighing more than one ounce.

If seems to follow, therefore, that the extra ounce charge and the non-machinable surcharge significantly affect personal correspondence but not bill payments. This is important, because – as the comparative volume history of bill payments and personal correspondence suggests – the former is subject to electronic substitution to a degree not true of correspondence. Bill senders, indeed, often urge their customers to switch to on-line payment. GCA tracks the relative volume trends of bill payments and selected correspondence products, using

[4] FY 2020 *Household Diary Study,* Table 3.10.

Household Diary Study data, and the trend lines show clearly how personal correspondence has remained far steadier than bill payments. The most recent GCA chart, using data from FY 2008 to FY 2020, is attached as Exhibit I.

This should suggest that personal correspondence is a preservable mail category, to a degree not true of bill payments. To seek to extract additional revenue from undifferentiated Single-Piece Letters via the extra ounce and non-machinable charges – to say nothing of unprecedented, drastic increases in the basic stamp price – is thus likely to be counterproductive for the Postal Service and its customers. It will drive away customers who (as the comparative volume history shows) still want to use the mail to communicate with family and friends, while doing nothing to encourage them to lessen their migration to e-media for their bill payments.

<u>The need to reopen the sec. 3622(d)(3) review process</u>

1. The House Report was, of course, issued well before the enactment of the Postal Service Reform Act of 2022 (hereinafter, "PSRA 2022"). But it did express concern at the size of the rate increases made possible by the final order in Docket RM2017-3. Indirectly, at least, the Report seems to call for re-examination of what the Commission found necessary in Order No. 5763 – even independently of the then-unenacted PSRA 2022. Now, however, that legislation has removed most of the financial basis for the RM2017-3 order. Order No. 5763 therefore reflects – indeed, inescapably rests on – a fact situation which no longer exists.

The Commission has before it two petitions to reopen the tenth-year review process in light of PSRA 2022 – one filed by GCA and the American Forest and Paper Association, and one by PostCom et al. (Dockets RM2022-6 and RM2022-5, respectively). To avoid lengthening this document unduly, we ask the Commission to consider the petition in Docket RM2022-6 as incorporated fully in it. A copy of the petition is attached for convenient reference, as Exhibit II.

The key fact is that a great part of the justification for the final orders in Docket RM2017-3 has disappeared. PSRA 2022 relieves the Postal Service of some $57 billion in book deficits. The Commission's final order depends on the finding it made three years earlier, in Order No. 4257, that the PAEA ratemaking system for market-dominant products had, among other things, failed to produce medium- and long-term financial stability for the Postal Service. The Commission there found – correctly – that short-term financial stability (essentially, break-even or better performance in day-to-day operations) had been achieved. Order 4257 defined medium-term stability as equality of total cost and total revenue, and long-term stability as that plus retained earnings. But the inability of the PAEA system to establish the latter two elements rested on the finding that accumulated deficits totaled $59.1 billion.[5] The Commission explicitly found that objective (b)(5) required it to include the retiree health benefit liabilities in its evaluation of financial stability.[6]

Because the Postal Service must use generally accepted accounting principles (GAAP), its non-payment of retiree health benefit obligations has appeared on its books as a liability – though it made little visible difference to the Service's ability to process, transport, and deliver the mail. The Commission found that even without considering borrowing authority the Postal Service had shown operating profits in six of the ten years reviewed (FY 2007 to FY 2016)[7] and when available borrowing was included, in nine of those years.[8]

We thus face a situation in which (i) the finding of no medium- or long-term stability rested on a computation of $59.1 billion in book deficits, and (ii) new legislation has relieved the Postal Service of liabilities amounting to $57 billion.

We first take up the most obvious conflict between the Order 5763 rules and the Reform legislation: the additional pricing authority made available to help cover retiree health obligations. These rules are explained at pages 100 et seq. of Order 5763. The Commission found that "retirement costs [are] a specific driver of the Postal Service's net losses." Section 8606(a)(2)(a)(b) of title 5, U.S.C., as it then stood, required the Service "to prefund long-term retiree health benefits" (id., p. 101). And

> . . . As of September 30, 2019, the Postal Service has missed or defaulted on a total of $47.2 billion in payments to the R[etiree]H[ealth]B[enefits]F[und].

Id., p. 102. The Service was required to liquidate the remaining unfunded balance in the RHBF by 2056.

Further explaining what it was enacting, the Commission said (id., p. 104):

> The specific retirement costs targeted by the retirement-based rate authority are the annual amortization payments for the unfunded RHBF liability, the amortization

[5] Order 4257, Table II-12. The Commission stated that "[t]he accumulated deficit of $59.1 billion includes $54.8 billion in expenses related to prefunding the RHBF." Id., p. 171.

[6] Id., pp. 158-159.

[7] Id., Table II-7.

[8] Id., Table II-8.

> payments for any unfunded CSRS liability, and the amortization payments for FERS supplemental liabilities (collectively, amortization payments).

Section 102(c)(1) of PSRA 2022 also targets such costs:

> (1) CANCELLATION OF PAYMENTS. – Any payment required from the Postal Service under section 8909a of title 5, United States Code, as in effect on the day before the date of enactment of this Act that remains unpaid as of such date is canceled.

If the cost element – found by the Commission to be outside the Postal Service's control – which justified this added rate authority has now been done away with by legislation, it follows that retention of that added authority would make the Commission's order arbitrary.[9]

Throughout this discussion, it should be borne in mind that the Commission's purpose – which it stated clearly more than once – was to place the Postal Service "on the path" to financial stability but not to produce that stability wholly by revising the market-dominant rate system. It rejected the Postal Service's theory that the sec. 3622(d)(3) process should produce a "reset" of rates at full break-even levels.[10] In this respect the Commission's approach was correct. (PAEA, after all, was justified as a *departure* from full cost-of-service ratemaking with its explicit[11] requirement of break-even rates.) And because that is so, it is necessary for the Commission to "start from scratch" in a renewed sec. 3622(d)(3) review, and discern whether the market-dominant ratemaking system as it existed before Order 5763 is *now* capable of achieving the objectives and factors of PAEA – and insofar as the investigation is concerned with objective (b)(5), to ascertain whether that original system is *now* able to put the Service "on the path" to stability. Thus Order 5763 states (p. 80) that

> . . . [T]he Commission's proposal is not intended as a true-up. The intent is to address identified deficiencies in the current price cap system that contributed to the failures of that system to meet the objectives of 39 U.S.C. § 3622(b). The density-based rate authority is specifically intended to address the future rise in per-unit costs caused by declines in density, but is not intended to recalibrate rates to reflect the Postal Service's density at a specific point in time. The recalibration of rates suggested by the Postal Service goes beyond the scope of modifying the ratemaking system to address specific deficiencies.

---

[9] This is especially clear because the Commission took considerable pains to insure than dollars collected via the retirement-related pricing authority would be devoted to retirement cost amortization and nothing else. Order 5763 at pp. 101, 107, 115.

[10] Id., p. 80.

[11] Former 39 U.S.C. sec. 3621.

And indeed, the other principal element of the Commission's added rate authority was that same density-related add-on, intended to compensate the Postal Service for the increase in cost per piece due to fewer pieces per delivery. It is true that PSRA 2022 does not contain a provision aimed at remedying this trend, nor could it realistically have done so. It is Congress's task to remove structural obstacles to the Postal Service's ability, through its own efforts as well as with a sound regulatory system and a realistic legislative appraisal of its capacities, to continue rendering adequate service on a financially sound basis. Congress should not be expected to forecast when, why, and by how much the Service's unit costs will change.

This is one very prominent reason why the Commission should, in reopening the sec. 3622(d)(3) review, determine whether the PAEA market-dominant ratemaking system *as originally established* is capable of fulfilling the objectives with due attention to the factors. The fundamental reason for concern with declining density, as the Commission's orders have shown, is that it would make an untenable financial situation worse. Density decline by itself would not have justified a drastic overhaul of the ratemaking system.

Because so much of the financial basis for Order 5763 has changed, it is important for the Commission to begin the sec. 3622(d)(3) process again "from the ground up." Merely reexamining the Order 5763 structure to see if any of it can be dispensed with would presume that the Order 4257 conclusions on which it depends are somehow still present, or mostly present. This is not the approach which PSRA 2022 and the resulting future path for the Postal Service call for. The comprehensive review requested in the petition in Docket RM2022-6 is the proper course to follow.

2. A complete reopening of the sec. 3622(d)(3) process is important for other reasons. One prominent reason is that it would give the Commission an opportunity to re-think its Order 5763 conclusion that the objectives and factors of PAEA need not be considered in a price adjustment case because they have already been "balanced" in establishing the alternative ratemaking system. See Order 5763, pp. 255 et seq.

We do not raise this issue in order to reopen debate over the meaning of the *Carlson* decision.[12] We read that decision as requiring consideration of the objectives and factors in a price adjustment docket, and the Commission reads it differently. Rather than reconsider *Carlson*, we would emphasize the key distinction between legislation and implementation.

[12] *Carlson* v. *Postal Regulatory Commission,* 938 F.3d 337 (D.C. Cir., 2019).

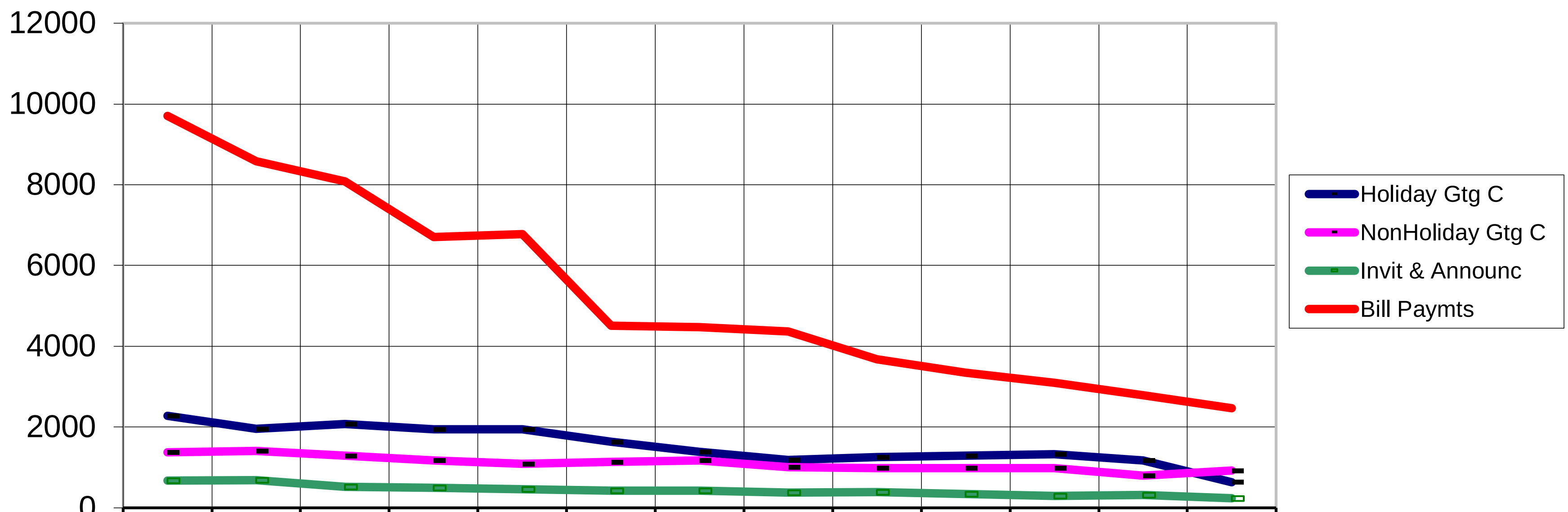
Granting, purely for argument's sake, that the Commission did properly balance the objectives and factors in arriving at the alternative system, it does not follow that consideration (and so far as necessary, further balancing) of those provisions is superfluous in a particular R-docket. Legislators – whether in Congress or in an Executive agency – cannot realistically expect to foresee, and resolve in the rules they enact, every fact situation which may in a future case raise a material issue of compliance with the governing statute. Reverting to an earlier example: the agency, in rulemaking, may "balance" the objectives by assigning a weight of five to one objective (we use (b)(2) in this example) and a weight of seven to another. But a 50-percent increase in the price of one product, whose price had varied little in the past, clearly raises an issue under objective (b)(2) (stability and predictability). That this objective may *in general* carry a weight only 5/7 that of another objective does not settle the question whether *this increase* violates objective (b)(2)[13] and does so to such a degree that that objective is not outweighed, as to that questioned rate, by any conflicting one. In other words, "balancing" is the job of the legislator (here, because of the delegations in 39 U.S.C. 3622(a) and 3622(d)(3), the Commission in its rulemaking mode) and application of the balanced objectives and factors is the job of the enforcement agency (here again the Commission, in its rate-case processing mode) *each time it is faced with a particular set of facts.*

Consequently, we believe that the Commission should take the opportunity to modify its position that no consideration of objectives and factors is ever needed in an R- docket, and give itself the flexibility to consider them whenever a party to a rate adjustment case raises a material issue under one or more of them.[14]

[13] In our view, it plainly does. Taking our view as correct, for argument's sake, the Order 5763 model would mean that a clear violation of a statutory objective could be ignored in the relevant rate docket, simply because that objective had, in setting up the system of rules, been assigned a smaller weight than certain others with which the challenged rate was found to be consistent. It is significant in this connection that the Commission held that the new system did *not* defer challenges to after-the-fact (compliance review or complaint) proceedings *because* the objectives and factors had been balanced in the rulemaking. See Order 5763, pp. 260-261. Consider the situation of a party which did not participate in the rulemaking – and perhaps did not then even exist – but which in a future R- docket has a legitimate, material issue of whether a rate complies with one or more of the objectives.

[14] This is the more feasible – and desirable – because in Order 5763 the Commission, quite appropriately, extended the time frame for decision in an R- docket.

Household Volume Trends



	FY2008	FY2009	FY2010	FY2011	FY2012	FY2013	FY2014	FY2015	FY2016	FY2017	FY2018	FY2019	FY 2020
Holiday Gtg C	2278	1959	2073	1945	1944	1633	1393	1180	1262	1288	1332	1170	634
NonHoliday Gtg C	1374	1409	1295	1173	1086	1134	1169	1005	982	981	989	797	925
Invit & Announc	677	685	521	492	460	426	429	384	390	339	297	315	238
Bill Paymts	9704	8580	8088	6707	6776	4513	4470	4368	3684	3347	3100	2784	2467

GREETING CARD ASSOCIATION

EXHIBIT II

PETITION IN DOCKET NO. RM2022-6

Postal Regulatory Commission
Submitted 4/11/2022 3:22:09 PM
Filing ID: 121409
Accepted 4/11/2022

Before the
POSTAL REGULATORY COMMISSION
Washington, DC 20268-0001

Statutory Review of the System for Regulating Rates and Classes for Market-Dominant Products, Phase II (Post-Legislation)	: : : : :	Docket No. RM2022-6

PETITION FOR POST-LEGISLATION REVIEW OF THE SYSTEM
FOR REGULATING MARKET-DOMINANT RATES AND CLASSES

Introduction. The Greeting Card Association and the American Forest and Paper Association ("Joint Petitioners") respectfully request that the Commission vacate Order No. 5763 (Docket No. RM2017-3), open a rulemaking docket, and in it conduct a new review, ab initio, of the system of rates and classifications for market-dominant products. This review is necessary because of the enactment of the Postal Service Reform Act of 2022 (hereinafter, "PSRA 2022"), signed by the President on April 6, 2022. This is the kind of "unforeseen change" which the Commission stated in Order 5763[1] could necessitate further review of the system. The new legislation has removed much of the basis on which the Commission justified the changes it made in Order 5763. Those changes may no longer be assumed to be "necessary to achieve the objectives" of the market-dominant regulatory system. Only changes satisfying that standard are permissible under sec. 3622(d)(3)[2], and thus an ab initio review is necessary.

A principal basis of Order 5763 was what the Commission found to be the inability of the existing market-dominant regulatory system to provide medium- and long-term

[1] At p. 20.

[2] Unless the context clearly requires otherwise, section numbers standing alone refer to Title 39, United States Code.

financial stability for the Postal Service. This was a conclusion of Order 4257 and remained the main basis for the changes the Commission ultimately made. The Commission's remedial approach was, in essence, to provide for increased revenue.[3] Many commenters objected to these revenue measures.[4]

The Court of Appeals decision. The decision of the Court of Appeals for the District of Columbia Circuit upholding Order 5763 necessarily rested on the statute as it stood during the Commission's sec. 3622(d)(3) review process, the Postal Accountability and Enhancement Act (PAEA) of 2006. The governing statute is now very different. The Court's finding that what the Commission had done in Order 5763 *under the 2006 statutory provisions* was not error thus cannot be relied upon now. Nothing establishes that under the new statute the Commission would have taken those actions, nor (if it had) that the Court would have found them justified.[5] There is much to suggest that under the new legislation the Commission would *not* have acted as it did – and, if it had, that the Court would have remanded the order as noncompliant with the statute. Consequently, the Commission must restart the sec. 3622(d)(3) process. To use Order 5763 as a basis and change or remove only those parts of it which the PSRA 2022 seems to make inappropriate would be inadequate. This is true because the system resulting from such a partial review would still be based on a statute which, since the review was conducted, has been extensively changed, and changed in a way that removes the major basis for Order 5763.

[3] The efficiency-based revenue reward included in Order No. 5337 was excised for separate treatment (Order 5763, pp. 158, 160 et seq.); in Docket No. RM2021-2. This separate proceeding was held in abeyance by Order 5928.

[4] See, e.g., Docket RM 2017-3, the multi-party *Explanation of Options for a Financial Stable Postal* Service (Feb. 3, 2020*); Comments of the Alliance of Nonprofit Mailers* et al. (Feb. 3,2020); *Reply Comments of the Greeting Card Association.*

[5] The Commission's finding that system failed to "maintain[ ] the Postal Service's financial stability" was prominent in the Court of Appeals opinion. *National Postal Policy Council* v. *Postal Regulatory Commission,* 17 F.4th 1184, (D.C. Cir., 2021), petition for certiorari pending in the Supreme Court, No. 21-1124.

In subsequent sections we describe the main changes made by the PSRA 2022 and how they require *ab initio* review of the market-dominant system under sec. 3622(d)(3).

I. THE FINANCIAL BURDEN OF RETIREE HEALTH CARE PREFUNDING IS NOW ABOLISHED

Section 202 of the PSRA 2022 does away with both the draconian retiree health care prefunding scheme enacted in 2006 and the accumulated unpaid obligations which have added $47 billion[6] to the Postal Service's deficits. Order 5763 rested substantially on this obligation, and the Commission created a specific revenue enhancement to deal with it.[7] The Postal Service was thereby entitled to additional rate authority, with the associated revenues strictly dedicated to servicing the retiree health care prefunding obligation.

The PSRA 2022 reform eliminating the retiree health care prefunding obligation is estimated to save the Postal Service about $27 billion over ten years.[8]

This ten-year time frame is consistent with the Commission's premise that where the PAEA system fell short was with respect to medium- and long-term financial stability. That the Commission also was focusing on the longer run is clear from the five-year phasing in of the additional rate authority.

Because the retiree-related rate authority was to be used *only* to pay for retiree healthcare obligations which the PSRA 2022 has abolished, it has no more basis for existence. The statute under which the Commission was operating when it issued Order

[6] Order 5763, p. 102.

[7] Id., pp. 100 et seq.

[8] For financial details, see Congressional Budget Office Cost Estimate for H.R 3076 (February 2022).

5763 created those obligations, and they now do not exist.[9] Consequently, the additional rate authority dedicated to alleviating them must be discarded. As with the other changes made by the PSRA 2022, the proper approach is to inquire whether the market-dominant system *as originally enacted in 2006* is achieving (or will achieve) the sec. 3622 objectives, with due attention to the factors.

II. CONGRESS'S REFORM OF POSTAL EMPLOYEES' HEALTH CARE SYSTEMS REQUIRES A COMPLETE MAKEOVER OF THE TENTH-YEAR REVIEW

The Commission concluded that as market-dominant volume declines the delivery cost per piece of that mail tends to rise.[10] The remedy incorporated in Order 5763 was a complex adjustment under which the institutional-cost effect of density decline would be alleviated by additional rate authority. Two important facts must be kept uppermost in approaching this problem. (1) The Commission emphasized that the Order was not meant to produce a breakeven result but to place the Postal Service "on the path" to financial stability.[11] And (2) the density-related rate authority operated only on institutional cost; a decline in volume carries with it a decline in volume-variable cost.[12]

Delivery cost is largely institutional. In the FY 2021 *Public Cost Segments and Components* report, City Carrier Street Time (C/S 7) recorded about $8.8 billion in "Other" (institutional) cost, which was about 62.9 percent of the $14 billion total. Rural Carriers (C/S 10) showed about $5.9 billion in Other cost – roughly 63.4 percent of the total ($9.3 billion).

[9] It is not insignificant that in responding to a comment in Docket RM2017-3, which had argued that Congress and not the Commission should deal with the retiree healthcare obligation, the Commission said that *in the absence of legislation* it had authority to do so. Order 5763, p. 116. That legislation has now been enacted. The Order thus suggests that with the legislation in place, any authority the Commission might have had at that time is now gone.

[10] Order 5763, pp. 72 et seq.

[11] Order 4258, p. 53.

[12] See Order No.5337, p. 71.

These reforms are estimated to save the Postal Service about $22.7 billion over ten years. Taking this sum together with the abolition of the PAEA retiree health pre-funding mandate indicates ten-year savings of about $49.7 billion, an average of almost $5 billion a year.

In Order 4257, at Table II-10, the Commission estimated ten years of Postal Service losses at $62.356 billion, or an average of $6.2 billion a year. Interestingly, the Table shows one "outlier" – a FY 2012 loss of $15.9 billion, more than two and a half times the average. If we excluded FY 2012, the average annual loss would become about $5.2 billion. It was on the basis of the losses shown in Table II-10 that the Commission concluded that the system had failed to produce medium-term financial stability.

The two quantified PSRA 2022 savings thus would cancel either 5 / 6.2 = or 80.6 percent or (if we exclude the FY 2012 value) 5 / 5.2 = 96.2 percent of the Table II-10 losses. The Commission's conclusion, reached in the unreformed PAEA context, that the system could not achieve medium-term or long-term stability is thus clearly invalidated by the new legislation.[13]

III. CONCLUSION

Joint Petitioners therefore respectfully requests the Commission

A. To vacate Order 5763, thereby returning the market-dominant regulatory system to its pre-tenth-year-review configuration;

B. Institute a new review under sec. 3622(d)(3), in which

[13] Because PSRA 2022 is the "unforeseen change" which would call for revisiting Order 5763, we have focused on it. There are other likely, but not "unforeseen" changes which would, when they occur, further improve the Postal Service's financial situation. For example, the Service's *Delivering for America* plan involves substantial savings from changes in service standards, associated transportation economies, and other programs. See that document at p. 48, Fig. 30.

C. It would investigate, after considering parties' comments and reply comments, whether the pre-tenth-year-review system would satisfactorily achieve the sec. 3622(b) objectives, with due regard to the sec. 3622(c) factors, on which issue it would

D. Make findings, similar to those made in Order 4257, regarding the ability of the pre-tenth-year-review system to achieve the objectives and factors; and

E. If it finds, in any respect, that such system would not achieve the objectives and factors, institute a fresh rulemaking proceeding (or a second phase of the initial proceeding) to investigate, with opportunity for comments and reply comments, what changes would be required to remedy the shortcomings so found.

April 11, 2022

Respectfully submitted,

AMERICAN FOREST AND PAPER ASSOCIATION

Mark Pitts
Executive Director, Printing-Writing, Pulp & Tissue
1101 K Street NW, Suite 700
Washington, DC 20005
(202) 463-2764
E-mail: Mark.pitts@afandpa.org

GREETING CARD ASSOCIATION

David F. Stover
2970 S. Columbus St., No. B1
Arlington, VA 22206-1450
(703) 998-2568 or (703) 395-1765
E-mail: postamp02@gmail.com

From:	Ansley Jackson
To:	Stakeholder Input
Subject:	Postal Rate Increases
Date:	Thursday, July 28, 2022 5:55:54 PM
Attachments:	ACS-RGB.png Commissioner -Postal Increase Letter 2022.pdf

Dear Commissioners:

Attached please find a letter from the American Cancer Society in regards to the continued postal rate increases. We appreciate your consideration.

Thank you,
Ansley Jackson

Ansley Jackson
Direct Mail Marketing Manager

American Cancer Society, Inc.
3380 Chastain Meadows Pkwy NW Suite 200
Kennesaw, GA 30144
cancer.org | 1.800.227.2345

July 28, 2022

Postal Rate Commission
901 New York Avenue NW, Suite 200
Washington, DC 20268-0001

RE: Docket RM2022-5

Dear Commissioners:

I am writing on behalf of The American Cancer Society, our mail responsive donors and, most importantly, those we serve. We rely on the U.S. Postal Service to raise funds and communicate with our supporters and constituents. Without the mail, our revenues would decline and, as a consequence, so would our ability to fund our mission.

We mail over 70 million packages annually. We rely on the USPS to fundraise, and continued postage rate increases would mean a reduction in our use of the mail, causing a reduction in our revenues, and, in turn, a reduction in our ability to serve those impacted by cancer. This year, more than 1.9 million people nationwide will be diagnosed with cancer. The gifts we get through the mail help save lives by funding lifesaving research and providing essential programs and services for prevention and early detection, patient support, and the trusted information cancer patients and their families need.

Respectfully, we ask you to consider the impacts continue rate increases will have on our organization, our lifesaving mission and our ability to mail large volumes.

Sincerely,

Ansley Jackson
Direct Mail Marketing Manager
American Cancer Society

From:	Kevin Yoder
To:	Stakeholder Input
Subject:	Keep US Posted Response to PRC Request for Stakeholder Input
Date:	Thursday, July 28, 2022 12:01:18 PM
Attachments:	7-27 Keep US Posted Response to PRC Request for Stakeholder Input-Final.pdf

Please find attached comments on behalf of Keep US Posted. I can be reached at 913-526-1990 should there be any questions regarding this submission. Thank you for your engagement with stakeholders on this critical concern.

Sincerely,

Kevin Yoder
Executive Director, Keep US Posted
https://www.keepusposted.org
Former Member of Congress (2011-2019)

Comments from Former Representative Kevin Yoder (R-KS) on Behalf of Keep US Posted

Introduction

Responding to the Commission's announcement of May 26, 2022, pursuant to House Report 117-79, Keep US Posted here provides the requested input. Keep US Posted is a campaign supported by commercial and individual consumer users of the United States Postal Service (USPS). The organization is committed to its sustainability and to the health of the customer base upon which USPS depends. We believe the House report which prompted the current comment period identifies many significant issues that are before the Commission. As noted in the House report, Congress enacted the Postal Service Reform Act (PSRA; Public Law No: 117-108), which profoundly improves the USPS's financial condition. These changes should prompt a new on-the-record review of rate caps for Market Dominant mail.

2006 Postal Accountability and Enhancement Act

The 2006 Postal Accountability and Enhancement Act (PAEA; Public Law No: 109-435) dramatically revised the way postage rates are set. It replaced a lengthy and litigious rate-setting system with a price cap for Market Dominant mail products. It codified a grand compromise between mailers and the USPS that replaced the detailed examination of each rate increase that protected mailer interests with a cap that would give the USPS flexibility to adjust rates within a limit that would ensure stability and predictability for postage prices and motivate efficiency improvements. Most importantly, the law also gave the Postal Regulatory Commission (PRC) the responsibility of administering the rate cap in a way that would protect ratepayers who had lost much of their ability to challenge unfavorable rate increases.

The PRC, however, commonly examines rate changes only for compliance with the rate cap; other rate issues must be raised *ex-post* in an annual compliance review. PAEA explicitly gives USPS "pricing flexibility" and qualifies its requirement of a just and reasonable rate schedule by allowing differential changes between or within mail classes. Prices for USPS competitive products (mainly packages) are unregulated save for a few basic rules mainly designed to prevent cross-subsidization of competitive products by captive customers. While this system worked well initially, more recently the financial challenges of the USPS, the inability of Congress to quickly pass postal reform, and the failure of the PRC to adequately balance the conflicting factors and objectives have resulted in an expanded price cap that no longer reflects an adequate balance of the interests of the USPS monopoly and its captive customers.

The Current Regulatory Approach is Inadequate

Much of the current state of affairs is the product of financial challenges facing the USPS, such as the impact of digital technology, the great recession, and the failure of Congress to promptly enact consensus postal reform legislation. The postal reform law which just passed is functionally identical to legislation introduced in 2016 that could have fully repaired the USPS deficits, had it passed within a year or two after introduction. The delay allowed USPS losses to compound to a point that created continued financial challenges. However, the PRC has also engaged in a series of self-deregulatory actions that have, over time, eliminated many of the protections for mailers that made the compromise under PAEA viable.

Shortly after the passage of PAEA, the PRC eliminated the Office of Consumer Advocate (OCA). The statute, in place since 1970, required the PRC to appoint an "officer of the Commission" to represent the interests of the "general public," and provided an independent advocate to regularly examine the interests of individual consumers and engage on their behalf in proceedings with a consistent approach.

Instead, the PRC has replaced the OCA with an inadequate Public Representative – a rotation of staff through the role proceeding-by-proceeding, offering little continuity or consistency in approach. Moreover, the current Public Representative is no longer instructed to focus on the general public. Rather than eliminating the OCA, it should be expanded to address the concerns of all of the USPS's monopoly customers, and its mission should be determined through consultation with those customers rather than dictated by PRC leadership.

There are numerous examples of how the current system fails to serve the interests of the customers, whom the PRC was created to protect from the monopoly it was intended to constrain. In 2019 the USPS moved to raise the price of the Forever Stamp by a nickel, which was the largest increase (10 percent) for the First-Class stamp in history. Inexplicably, the increase was supported by the Public Representative appointed in the proceeding and approved by the PRC. An individual consumer challenged the increase in court and succeeded in having it remanded in a decision distinctly critical of the PRC's approach (*Carlson v. Postal Regulatory Commission,* 938 F.3d 337 (D.C. Cir., 2019). Yet after all of the time and effort in challenging the increase, the revised decision by the Commission left the increase in place and simply rearranged the rationale for approving it. This experience, along with many others, has put the effectiveness of the PRC in doubt. It is not meeting the mission for which it was created.

With regard to the current challenge, the PRC's approach to balancing the factors and objectives related to the price cap has been inadequate. In its November 2020 decision to expand the cap (Docket RM2017-3, authorized by 39 U.S.C. 3622(d)(3)), the PRC focused primarily on only one objective to ensure adequate revenue. It failed to balance other factors that were intended to protect the customers subject to it. The PAEA calls for, inter alia, "predictability and stability in rates" (39 USC 3622(b)(2)). The PRC has said that this responsibility involves both the timing and the magnitude of a rate increase. Yet the current price cap represents a burdensomely large increase, which raises serious concerns that the PRC is meeting its responsibility.

More distressing is the fact that the PRC has failed to exercise its discretion to gather the information that would even allow it to examine significant challenges impacting the USPS customer base. For example, the PRC even rejected pleas from mailers and closed the record of the 10-year review in March of 2020, when the threat of the COVID pandemic was clearly evident. Rather than keep the record open the gather information that could have informed its decision, the PRC engaged in willful blindness and established a cap that fails to reflect the impact of COVID. As a result, the full scope of the pandemic's impact on the USPS and its monopoly customers was unknowable. Now, with the effects of the pandemic better understood and the PSRA's elimination of the prefunding obligation that had previously justified the expanded cap, the PRC has a duty to review the proposed rate increases again. Yet it has not acted on two petitions from mailers seeking a new review of rates (Dockets RM 2022-5 and RM2022-6).

A Better Regulatory Approach: Back to the Beginning

As a former Member of Congress, I know that there is a process whereby legislation gets implemented by regulators. Yet this implementation – which is necessary for a functional and effective system of governance that with regard to postal policy – is now in jeopardy. By virtue of its creation in the 1970 Postal Reorganization Act, Congress clearly anticipated that the PRC would provide regulatory oversight of the USPS' government monopoly in order to protect the public interest. The Senate report on what became the Postal Reorganization Act of 1970 stated:

> *In discharging the highly important responsibilities vested in this Commission, it must exercise its best judgment to insure that all postal rates, fees, and classifications are reasonable and equitable, and to insure that the rights of all mail users are protected, throughout the ratemaking and classification process, by careful consideration of all the specific public-interest factors that the statute requires be taken into account, and by faithful adherence to all of the ratemaking and classification standards set forth in the statute.*[1]

Until 2006, the public interest was protected by a lengthy-though-cumbersome litigation process that examined every rate change in detail in a process taking up to 10 months. In 2006, PAEA replaced that process with a price cap, which all stakeholders (including USPS management) approved of to ensure predictability and stability for ratepayers. For exigent circumstances requiring increases in excess of the cap, a more detailed process for evaluation was provided and was successfully used to respond to the impact of the great recession. But the Congress also provided the PRC with broad powers to protect the public, such as subpoena power that it has never used.

The PRC has been reluctant to engage in activities beyond the specific direction of Congress. That is not how the system should operate. Other regulatory bodies have effectively utilized the authority provided by Congress to achieve their mandate. For instance, the Environmental Protection Agency aggressively acts to prevent pollution. The Securities and Exchange

---

[1] 91st Cong., 2nd Session, S. Rep. 91-912, *Postal Reorganization* (June 3, 1970), p.14

Commission is active in preventing bank fraud. If anything, these agencies have at times been accused of being too aggressive in enforcing their authority. Yet in recent years the PRC has been far more deferential to the entity it was created to constrain, rather than protective of the public it was created to serve. Its leadership has defined its role as “calling balls and strikes,” but an effective umpire must ensure adherence to all of the rules of the game.

The public needs the PRC to play a functional role in balancing the short-term financial interests of the USPS with the long-term health of the postal ecosystem. A useful starting point would be for the PRC to grant one or both of the existing petitions to review the rate caps. Such a review would effectively factor in the issues that Congress raised in creating this stakeholder input process, as well as the substantive impact of the PSRA, which occurred after the FY2022 appropriations bill was enacted. Rather than taking its extended price cap and simply tinkering with its details, the PRC should start from ground zero and determine whether the price cap system enacted in 2006 is *still* capable of fulfilling the statutory objectives.

In the medium term, the PRC should restore the type of function served by the OCA but expand and improve its purview. This entity should seek to advocate for all of the USPS’s monopoly customers and regularly engage with them to understand their concerns. A single individual with adequate staff should be appointed to ensure consistency and accountability throughout all proceedings that affect Market Dominant rates and services. The current Public Representative is barred from communicating with the Commissioners and their advisers about the merits of a case. The wall of separation should also bar directives *to* the Public Representative – or a restored OCA – in regards to what may be advocated or argued on the public's behalf.

Opportunities for Further Legislation

The PRC has broad power to exert its existing authority and revise its approach. Congress did not require or imply the narrowing of the PRC’s regulatory activities and programs that has occurred since 2006. These changes came from decisions made by prior PRC leadership, and there is an opportunity to pursue a better path. However, Congress also should also refine and clarify the expectations and powers of the PRC. If the experience of unintended consequences from the 1970 Postal Reorganization Act and the 2006 PAEA teaches anything, it is the peril of failing to correct the unintended consequences which are inevitable when complex legislation is applied to a dynamic marketplace.

Foremost, Congress should make clear that the transfer of funding responsibility for the PRC from a direct appropriation to an allocation by the USPS Board of Governors does not proscribe its authority to pass needed legislation. While it is true that the USPS Board previously controlled funding for the PRC, it must be remembered that throughout that period (1970-2006), every rate change was automatically litigated in detail. The 2006 PAEA price cap eliminated that protection, cumbersome though it was. By reverting to the prior funding model, Congress has effectively turned back the clock, giving the fox the key to the hen house. The current imbalance between USPS discretion and effective regulatory oversight is ripe for abuse. The 1970 Senate report noted:

> *The bill provides that the Postal Rate Commission shall be a body fully independent of the Board of Governors and fully independent of any influence whatsoever of the Postmaster General or of members of his staff. The Commission's independence is contemplated as being complete from the other arms of the postal service, subject to no subordination within the postal service either expressed or implied.*[2]

Congress should consider further clarification to ensure that this standard is fulfilled.

Congress should also further clarify the PRC's public service responsibility. Financial solvency is important but cannot be the only criterion. Rates should be examined through the lens of how they impact the health of USPS's customer base, not just whether they will provide adequate revenue at a single point in time. By the USPS's own measure, rate increases sought in the Delivering for America plan are predicted to result in a loss of 42% of mail volume. The reality could be much worse. At this point, excessive volume decline is not inevitable but is rather a self-fulfilling prophecy. The failure to consider the impact of rate increases not only on revenue <u>but also on</u> the health of the customer base and the ability to sustain service will ensure a negative outcome for consumers and the future of the USPS.

[2] Id., p. 13.

From: Steve Gustafson
To: Stakeholder Input
Subject: Comments from The Bradford Hammacher Group
Date: Wednesday, July 27, 2022 4:14:26 PM
Attachments: PRC_Comments_TBHG_7_27_22.pdf

Comments from The Bradford Hammacher Group

The Bradford Hammacher Group
Our Vision, Our Values…
Our Company!

July 27, 2022

Postal Regulatory Commission
Via email to stakeholderinput@prc.gov

Pursuant to the Postal Regulatory Commission's invitation of May 26, 2022, for stakeholder comments regarding a study on recent USPS rate increases and the expanded rate authority granted in 2020, the Bradford Hammacher Group is pleased to provide these comments. As a company, we entered nearly 214,000,000 Marketing Mail Letters and Flats with the USPS in 2021. Our business model creates (desirable) incremental mail volume for the USPS. For every Marketing Mail Letter or Flat we send out, it drives return of first-class stamped and first-class business reply mail, which in turn generates additional outgoing first-class correspondence (invoices) mail, not to mention package shipments.

Under the significant rate increase of August 29, 2021, some categories of our mail saw increase as high as 14%. We are a true direct response marketing company, we don't have any retail outlets, all of our commerce is driven through offline and online advertising channels, through which the USPS plays an important role. However, there is significant price elasticity in our business decisions and postage makes up well over 50% of our cost for a promotional effort (letter or flat). Thus, when faced with postal increases of the magnitude we've seen in the past year we have little choice but to curtail mail plans. When we mail a promotion we plan to a breakeven level, so when expenses rise and response rates are stable, our break-even line adjusts, and the more marginal names fall out of the plan. In just the first six months of this year we have already witnessed this effect – our Marketing Mail circulation is down 6% vs. same period last year (SPLY). If the USPS continues the planned trajectory of full use of the price authority granted it will be devastating to the mailing industry as it will just lead to continued circulation cuts followed by more rate increases due to lower volumes. It will set forth a spiral of continued decreased volumes in all categories. For an agency dependent upon mail volume to exist, increases such as these will only serve to damage its customers, business partners and ultimately the USPS itself.

We know the expanded rate authority granted to the USPS in late 2020 did not factor in the full effect of the impact of the Covid-19 pandemic as it relates to USPS volumes and their economic standing. The USPS received $10 billion dollars of emergency funding, which ended up just enhancing their cash position which at the end of FY 2021, was at $27.9 billion. Not to mention the significant volume growth in parcel volumes and increased revenues that this unforeseen volume brought with them.

We request and feel that it is necessary and incumbent upon the Postal Regulatory Commission, to take a second review of the system regulating rates for Market Dominant products. As part of this evaluation, we request that all current factors impacting the USPS' economic status be considered, including the recent passage of the PSRA law, which reversed a $59.6 billion liability for retiree health benefits.

Sincerely,

Steve Gustafson
Vice President, Marketing Services
The Bradford Hammacher Group

From:	Tonda Rush
To:	Stakeholder Input
Subject:	Comments from National Newspaper Association and News/Media Alliance
Date:	Wednesday, July 27, 2022 11:34:37 AM
Attachments:	NNA NMA final to all parties.pdf

Please find a joint letter from NNA and N/MA, which now includes MPA.

If there is any problem opening the letter, I can be reached at 703 798 3159. Many thanks for soliciting our thoughts.

Tonda Rush

July 27, 2022

The Honorable Michael Kubayanda, Chair
The Honorable Ann C Fisher, Vice Chair
The Honorable Mark Acton, Commissioner
The Honorable Ashley Poling, Commissioner
The Honorable Robert Taub, Commissioner
Postal Regulatory Commission
901 New York Ave., N.W., Ste. 200
Washington, DC 20268

BY ELECTRONIC MAIL

Dear Chairman, Vice Chairman and Commissioners:

Pursuant to the mandate of Congress issued in the Consolidated Appropriations Act of 2021 and published in the Joint Explanatory Statement of the House of Representatives Report 117-79, (H. Rep. No. 117-79 at 100 (Jul. 1, 2021) and the Commission's subsequent request for comment, the National Newspaper Association and the News/Media Alliance provide stakeholder views on the size and timing of the 2021 and 2022 postage increases. NNA and N/MA also suggest a specific action by the Commission.

Summary

The magnitude of rate increases in 2021 and 2022 has pummeled a newspaper and magazine industry that is already struggling to stay afloat. National concerns about the impact upon democracy if news journalists are no longer able to cover their communities have captured the attention of policymakers, who are proposing a variety of federal actions to help.

In this environment, the impact of postal rate increases adds fuel to a flame that already threatens American journalism. For community newspapers, the increases have particular impact because of these newspapers' near-total dependence on the Postal Service for distribution. Added to other factors affecting the industry—rapidly-rising paper costs, increased printing expenses and the challenges in maintaining a viable workforce—the exorbitant magnitude of postage increases is troublesome. Because the increases have accompanied dismal on-time service reports—particularly with End-to-End mail where publishers are wholly dependent upon the mail—the cumulative weight has added to the industry's burdens.

The Commission could help to ease these burdens by urging the Postal Service to use its discretion and avoid charging Periodicals mailers the optional two-percent non-compensatory surcharge under the revised rate regulations. While such action would continue to require a funding mechanism within USPS, the burden for this task is light and the yoke is consistent with historic precedent. NNA and N/MA therefore request that the Commission consider advising the Postal Service at its next available opportunity that the non-compensatory adjustment of 2 percent for Periodicals is not required.

Background

The National Newspaper Association has appeared before the Commission and its predecessor Postal Rate Commission since the creation of these regulatory bodies in 2006 and 1970, respectively, and before Congress in its deliberations over the Post Office Department since NNA's founding in 1885. NNA represents small community newspapers, primarily privately-owned weekly publications in towns across America. It has members in every state. NNA's main focus over the years has been Periodicals rates and service, including the Within County subclass that was created by Congress in 1845 to promote development and sustainability of community newspapers. In a recent survey, nearly 80 percent of NNA members say at least half of their circulations are in the mail, and more than half have nearly all copies in the mail. NNA's median newspaper is a privately-owned weekly publication with circulations of 3,000-5,000 copies per week. NNA members also use Marketing Mail to reach nonsubscribers and First-Class mail for business correspondence, billing, and promotions.

The News/Media Alliance is the successor to the Newspaper Association of America and the American Newspaper Publishers Association which, likewise, have appeared before the regulators both before and since 1970 on behalf of larger newspapers. Recently, the News/Media Alliance merged with the Association of Magazine Media to create N/MA. N/MA members represent many of the biggest and most renowned brands in the news publishing and magazine industries. They rely on the Postal Service to deliver valuable, compelling original journalism and educational, cultural, scientific, and informational periodicals to consumers. A number of N/MA members are also heavy users of Marketing Mail.

In debate over the Postal Reorganization Act, both organizations sought the reaffirmation by Congress of its traditional importance of newspapers in the mail. In the 1970s, second-class mail, as Periodicals mail was then known, was important for smaller newspapers as the primary distribution mechanism and for larger newspapers as the carrier for copies to exurban and interstate subscribers. In the later discussion of legislation that led to the Postal Accountability and Enhancement Act, the two organizations emphasized the importance of affordable postage rates and reliable service. Today, in the broadly changing media environment, these emphases are no less critical. To achieve their missions of serving Americans with news and information, all sizes of newspapers must have a reliable and efficient universal service reaching every household and business in the country at affordable rates.

Rate Increases 2020-2021

Since 2020, the Postal Service has had the authority to increase rates consistent with four variables: the rate of inflation measured by the Consumer Price Index for all Urban

Consumers (CPI-U); a density-based calculation to recognize the impact of declining mail volume; a retirement cost compensation and, for certain mail subclasses, a non-compensatory enhancement of 2 percent. The non-compensatory enhancement is intended to push subclasses whose revenues do not equal Postal Service's direct and indirect costs for the subclasses toward full cost-coverage.

The resulting increases for Periodicals mailers have been dramatic. At a time when annual inflation, though rising, remained under 3 percent, the Periodicals mailers saw increases at roughly triple the rate of inflation. Adding to the pain has been the fact that Service Performance for Periodicals has failed to meet standards or even USPS's target of 95% of standards—particularly for End-to-End mail where mailers have no delivery alternative.

Rate Year	**Periodicals Rate Increases by %**	**Periodicals End-to-End Annual Service Performance**
2021	10.156	74.3% (from trailing year)
2022	8.54	70.1% (YTD)

Newspapers have suffered as a result of these twin maladies: rapidly rising costs and failed service. In a survey of its members in June 2022, NNA found that 92% had lost subscribers in recent years because of poor mail delivery. N/MA members also lost significant numbers of subscribers, at a time when the pandemic struck businesses hard, causing businesses to reduce advertising in newspapers just when the public relied upon and needed information from their local newspapers the most.

While the inquiry at hand is about rate impact, and not precisely about service failures, it is impossible to gauge the effect of rates or service upon a mailing business without taking both elements into account. A willing buyer's determination to pay is based upon how well it values the service, but when subscribers are signaling their unwillingness to pay for late newspapers, publishers are left with fewer customers to help bear the consequences of rising rates. ~~A~~ shrinking subscriber base due to USPS poor delivery and rising postage rates leaves newspapers with no good choices.

Present effect of higher rates

While dramatic price increases are rarely welcomed by buyers, the 2021 and 2022 rates hit smaller newspapers at a particularly vulnerable time.

In NNA's recent member survey, signs of stress appeared from supply chain disruptions:

- Two-thirds experienced increases in printing costs of 15-30% or higher;
- One quarter said that paper shortages were causing them to print fewer pages;
- One quarter said they were having trouble finding paper;

- Two-thirds said the increases in paper cost had been “unpredictable” in the past two years; and
- Perhaps most telling, in an industry where “reliable postal service” has traditionally been ranked as the most urgent priority, nearly half now say that “affordable rates” is the top concern.

Similarly, N/MA members have seen cost increases in paper and freight over 20% as well and printing and manufacturing costs rising over 10%. Paper supply is very tight, and some were forced to reduce the quality of paper to lower grades. The supply chain issues clearly have resulted in part from COVID-19 pandemic disruptions. But a realignment of the paper industry beginning with tariffs on newsprint implemented by the United States in 2018 has led to fewer printing-paper mills. Facing similar problems in the book-publishing industry, Publishers’ Weekly explains some of the factors that have tightened supply and raised prices. Among them: paper producers have been converting their mills to packaging. Looking for Answers to Paper Shortages (publishersweekly.com).

Adding to the paper procurement challenges have been staffing shortages and recruitment barriers. Many members are having difficulties finding independent carriers, leaving them dependent upon the postal service. Unfortunately, due to postage increases and subscriber losses attributed to poor service, some publications have been forced to cut staff or services/products, ultimately hurting the public.

Looking mostly for journalists who wish to live in small towns and cover the quotidian business of schools, city councils, youth sports and local elections, publishers of community papers have a hard time hiring from within current crops of graduating journalists. This challenging outlook lead NNA’s newspaper Publishers’ Auxiliary to host a series of interviews with journalism professors, trying to puzzle out ways for the industry to attract talent in newsrooms. The series suggested that the newsroom shortages would not end in the near future, as students moved toward social media that do not support newsgathering at the local level. As a result, NNA’s foundation began its own journalism courses online, to help newsroom staff recruited from within the communities to better perform their duties. But filling staffing gaps and educating new reporters will take time.

The State of the Industry—News Deserts

For those harboring a vision of multiple online news outlets (hopefully nonprofits, for those most cynical about the business models), a recent report by national media analyst Penelope Muse Abernathy, visiting professor at the Medill School, Northwestern University, dashes the hopes.

Newspapers are dying in many communities, and digital alternatives are not springing up to fill the void, Abernathy reports in The State of Local News, The 2022 Report. The State of Local News | Local News Initiative (northwestern.edu) More than two newspapers a week are disappearing, Abernathy says. The nation has lost more than a quarter of its newspapers since 2005. The trend has left many Americans relying upon the notable *un*reliable social media for news. Abernathy says:

> More than a fifth of the nation's citizens live in news deserts—with very limited access to local news—or in communities at risk of becoming news deserts. Seventy million people live in the 208 counties without a newspaper, or in the 1,630 counties with only one paper—usually a weekly—covering multiple communities spread over a vast area. Increasingly, affluent suburban communities are losing their only newspapers as large chains merge underperforming weeklies or shutter them entirely. However, most communities that lose newspapers and do not have an alternative source of local news are poorer, older and lack affordable and reliable high-speed digital service that allows residents to access the important and relevant journalism being produced by the country's surviving newspapers and digital sites. Instead, they get their local news—what little there is—mostly from the social media apps on their mobile phones.

If the Commission were to join the ranks of important policymakers who worry about what these trends mean for civic participation and democracy, they would not be alone. Major inquiries on the consequences of shrinking newspapers have been carried out by the Federal Trade Commission in 2008[1] the Federal Communications Commission in 2011, [2] and prominent members of Congress, who have introduced such measures as the Future of Local News Act, (S 1601), Eliminating Local News Deserts Act of 2021, (HR 5393), the Journalism Competition and Preservation Act (HR 1735 and S 673) and the Local Journalism Sustainability Act (HR 3940 and S 2434).

This Commission has the power to make a difference by relieving pressure applied to the news industry from rising postal rates.

The newspaper industry's proposal is affordable and in keeping with traditional public policy.

Newspapers occupy an important position in the mail environment.

They occupy about 18 percent of the Periodicals mailstream (an estimate made by USPS before many small daily newspapers began a migration to mail delivery). As an economic force, Periodicals in the mail are critical; data show that when consumers become wealthier and better educated, their reliance upon Periodicals grows.

---

[1] From Town Crier to Bloggers: How will Journalism survive the Internet Age? Federal Trade Commission workshop, 2009 From https://www.federalregister.gov/documents/2009/10/07/E9-24197/public-workshops-and-roundtables-from-town-crier-to-bloggers-how-will-journalism-survive-the

[2] Waldman, Information Needs of Communities, Federal Communications Commission, 2011 https://www.fcc.gov/sites/default/files/the-information-needs-of-communities-report-july-2011.pdf

Household Diary Study, Mail Use and Attitudes in FY 2019, at 49. 2019 Household Diary Study_Final.pdf (prc.gov). Keeping them in the mail has been a priority for policy makers concerned not only about the role newspapers play in civic life, but as enticements for postal recipients to pick up their mail. Both of these concerns should inform the Commission's report to Congress.

The storied history of newspapers in the mail provides the Commission with ample justification for protecting the status of these publications through well-advised postage rates and services. In a report to the Commission in 1995, postal historian Richard Kielbowicz guided commissioners on a walk through history, from Benjamin Franklin's decision to fill colonial mailbags with newspapers by what Kielbowicz calls the "striking innovation" to provide newspapers with preferred postage rates to modern day reiterations by Congress of the importance of newspapers in the mail.

The notion of an informed citizenry supported by postal policy has historically enjoyed bipartisan support. Even in the contentious battles of the early Republic between Federalists and Democrats, the parties generally agreed that newspapers should be supported by preferred postage rates. Federalists hoped the public education provided through widely-distributed newspapers would further national cohesion and a strong government while Democrats hoped that greater access to information would expose the excesses of the Federalists. It is not hard to imagine similar sentiments among partisans today and the imagination is buttressed by the bipartisan support in Congress for the various legislative proposals cited above.

Historically, regardless of their partisan viewpoints, both factions supported newspaper distribution at preferred rates, without regard to whether they covered their costs of distribution. At times, the Congressional mandate overrode objections by the postal administrations who seemed constantly buffered by administrative problems in distinguishing which publications deserved preferred treatment and which did not. But postal administrations generally supported the value of the news in the mailbox~~.~~ See, generally, Kielbowicz, A History of Mail Classification and its Underlying Policies, Docket No. MC95-1 July 17, 1995.

When Congress handed control of the postal system to the independent US Postal Service, regulated by the Postal Rate Commission, it bequeathed a clear expression of the value of Periodicals by reiterating the intention of drafters to preserve this preferred mail class. When Congress adopted the PRA, it gave the Postal Rate Commission wide authority to set rates. It opted for the Commission's independence rather than choosing to statutorily mandate rates for certain mail classes that had been traditionally received rate preferences, but nonetheless cautioned the Commission to heed the public service which certain preferred rates had performed. It included newspapers among those who serve. In the same legislation, Congress softened the impact of requiring postage payments to attain coverage of attributable costs by setting a multi-year schedule for certain preferred classes to gradually absorb the increases. See

Report of the House Post Office and Civil Service Committee, 91st Congress, No 91-912, June 3, 1970 at 12.

Today these values continue in 39 USC 3622(c)(11) where one of the factors the Commission is asked to consider is the educational, scientific, cultural and informational value of the mail, the so-called ECSI value. But in the PAEA era, the Commission has been faced with a conundrum. Though the act encourages the Commission to recognize the value of newspapers and magazines, the Periodicals mail class has been unable to achieve the statute's target that each class of mail or type of mail service bear the direct and indirect postal costs attributable to each class or type of mail service through reliably identified causal relationships plus that portion of all other costs of the Postal Service reasonably assignable to such class or type; 39 USC 3622(c)(2). In 2011, the Commission jointly studied the plight of the Periodicals' class endemic inability to cover costs and concluded that cost-control mechanisms were unlikely to resolve the tension between conflicting mandates, but that greater "pricing flexibility" from USPS might help. Periodicals Mail Study, a Joint Report of the United States Postal Service and the Postal Regulatory Commission, July 2011.

But two substantial factors in the overall environment of postal rates and regulations have occurred since PAEA.

One is that the print industry is clearly shrinking. Whether USPS could ever raise rates high enough to cover costs, even if there were no threat of accelerating the declines, is doubtful. The Commission noted in its Annual Compliance Determination of 2021 that Periodicals cost coverage had sunk to a new low of 53.2 percent, causing the Postal Service to have to absorb about $828 million. The Commission hoped that changes in mail processing and higher postage rates would stop the decline, but its comments are more hopeful than realistic. Annual Compliance Determination Report, Fiscal Year 2021, March 29, 2022 at 27-35. National concern about the disappearance of print journalism altogether should dispose of any lingering hopes that somehow publishers can increase their own prices enough to support double-digit postage increases each year.

Even if the class were to continue to suffer declines in cost coverage (even with inflation-based rate increases), the Postal Service remains a $77 billion agency. The magnitude of potential loss from a shrinking Periodicals segment becomes a lighter and lighter burden—while the preservation of the value of the class to the Postal Service's own mailbox offerings as well as to the nation is palpable.

The other rising factor is that the US Court of Appeals for the DC Circuit has recently reaffirmed the Commission's authority to resolve the tension between ECSI and cost-coverage pressures when it affirmed the Commission's authority to modify the statutory regulatory system in Title 39 with its own new rate regime to achieve the objectives and factors.[3] For whatever policy disagreements the rate authority decisions underlying the Court's review may have engendered, the result is that the Commission has discretion to resolve ambiguities over conflicting objectives and factors in section 3622 and can exercise its power to preserve newspapers, as a matter of sound public policy. Indeed, in its final order the Commission acknowledged "that the Periodicals class, in particular, comprises mailpieces that offer ECSI value."[4]

The Commission has exercised its PAEA authorities with an eye to sustainability of the US Postal Service. But sustainability of American newspapers is an equally worthwhile goal, and one that the Commission has the power to influence. NNA and N/MA urge the Commission to exercise its authority by waiving the annual 2 percent surcharge on Periodicals at its next opportunity.

Sincerely,

Brett Wesner
Chair
National Newspaper Association
PO Box 13323
Pensacola, FL 32591
(850) 542 7087
info@nna.org

Tonda Rush
General Counsel
CNLC LLC
3898 30th St N
Arlington VA 22207
(703) 798 3159
tonda@nna.org

Danielle Coffey
Executive Vice President & General Counsel
News Media Alliance
4401 N. Fairfax Dr., Suite 300
Arlington, VA 22203
(202) 641-7434
Danielle@newsmediaalliance.org

[3] NNA, N/MA (along with MPA) were petitioners in the case that led to this decision, a petition presented out of a desire to resolve ambiguities in the law.
[4] *See* Order No. 5763, Docket No. RM2017-3 (Nov. 30, 2020) at 194.

A realistic, long-term vision in pricing models for letter and flat rate postage is seriously needed – especially in the nonprofit categories. The situation as it stands now is a very real threat to the future of the nonprofit industry.

We urge the PRC to respond positively to the petition filed by the Alliance of Nonprofit Mailers on April 11, 2022 (Docket RM2022-5).

Respectfully,

Lynn Storey

Lynn Storey
Director, Direct Marketing
Mercy Home for Boys & Girls
1140 W. Jackson Blvd.
Chicago, IL 60607

From:	Scott, Terry Ann M - Washington, DC on behalf of Marshall, Thomas J - Washington, DC
To:	Stakeholder Input
Subject:	Stakeholder Consultation for Congressionally Requested Study Requested on Rate Increases
Date:	Friday, July 22, 2022 4:43:04 PM
Attachments:	2022 07 22 Marshall to Barker (PRC) re Stakeholder Consultation for Congressionally Requested Study Requested on Rate Increases.pdf

Good Afternoon Ms. Barker,

Please see the attached letter sent on behalf of United States Postal Service General Counsel Thomas J. Marshall regarding Stakeholder Consultation for Congressionally Requested Study Requested on Rate Increases.

Thank you,
Terry Scott
Office of the General Counsel
and Executive Vice President
United States Postal Service
475 L'Enfant Plaza SW, Room 6100
Washington, DC 20260-1100
202-268-2951
TerryAnn.M.Scott@usps.gov

THOMAS J. MARSHALL
GENERAL COUNSEL
AND EXECUTIVE VICE PRESIDENT

UNITED STATES
POSTAL SERVICE

VIA EMAIL

July 31, 2022

Erica Barker
Secretary
Postal Regulatory Commission
901 New York Avenue NW, Suite 200
Washington, D.C. 20268-0001

SUBJECT: Stakeholder Consultation for Congressionally Requested Study Requested on Rate Increases

Dear Ms. Barker:

Please accept this letter setting out the comments of the United States Postal Service for the study that the House Committee on Appropriations requested in connection with the Consolidated Appropriations Act, 2022. H.R. Rep. No. 117-79, at 100 (2021). The Committee on Appropriations cited the August 2021 market-dominant price increase—the subject of then-pending Docket No. R2021 2 and the first such price change after adoption of revised ratemaking-system rules in Docket No. RM2017-3 (the "10-Year Review")—and questioned whether the Commission's new rules adequately accounted for higher revenue flowing to the Postal Service as a result of the COVID 19 pandemic. The committee, therefore, requested that the Commission study the factors that produced those revenue increases (an increase in package volume and emergency funding for the Postal Service in the CARES Act) and whether "those factors should impact the rate increases proposed by the [Postal Service] and the [Commission] rules adopted in November [2020]." Id.

The Commission has already appropriately considered those factors in the 10-Year Review and determined that they do not justify any changes to the rules adopted there. Moreover, events after the July 2021 date of the committee report and after the rate increase in Docket No. R2021 2 have borne out the Commission's findings and reasoning. The density authority remains necessary and appropriate because mail volumes continue to decline even as the number of delivery points continue to rise, notwithstanding the increase in package volume and revenue that the committee report notes. The CARES Act funding, while welcomed, simply provided the Postal Service with up to $10 billion in reimbursement for COVID-19 related expenses, without affecting the fundamental longer-term financial difficulties that the Commission's revised rules aim at addressing.

475 L'ENFANT PLAZA SW
WASHINGTON DC 20260-1100
PHONE: 202-268-5555
FAX: 202-268-6981
THOMAS.J.MARSHALL@USPS.GOV
www.usps.com

Moreover, those factors do not call into question the specific August 2021 and subsequent price increases that have fully utilized the rate authorities provided by the Commission. The overall effects of the pandemic on the Postal Service highlighted the critical need to address our longstanding financial, operational, and service performance challenges. These challenges include a decade and a half of net losses (which continued during the pandemic) and chronic underinvestment that resulted in a network that lacks the needed reliability and resiliency. As the Commission found in the 10-Year Review, additional pricing authority is necessary to place the Postal Service on the path to financial sustainability, in conjunction with other initiatives by the Postal Service to reduce costs, increase efficiency, and grow revenue. Consistent with these views, the Postal Service's comprehensive strategic plan, Delivering for America: Our Vision and Ten-Year Plan to Achieve Financial Sustainability and Service Excellence, includes as one element the judicious use of the new pricing authorities provided by the Commission. Given the Postal Service's ongoing net losses and need for capital to invest in cost-reducing infrastructure modernization, responsible stewardship has thus far required maximal use of the Governors' pricing authority; once costs and revenues attain a more sustainable relationship, the Governors might reasonably decide to use some smaller proportion of available pricing authority. Through such increases, the Postal Service will generate needed revenue that will, along with the other elements of the plan, address our long-standing financial losses, give us the resources to make the necessary investments in people and infrastructure, and ensure the sustainable provision of universal service for years to come.

Turning to the committee report, that report speaks only of the overall magnitude of the price changes in Docket No. R2021-2, without specifying which of the new pricing authorities raised its concerns. Given its novelty and its quantitative predominance among sources of pricing authority in Docket No. R2021-2, it is reasonable to infer that the committee's question chiefly concerns the density rate authority (Table 1).

Table 1: R2021-2, Total Available Rate Adjustment Authority (By Class)

Class	CPI-U (%)*	Density (%)	Retirement (%)	Non-Compensatory (%)	Banked (%)	Total (%)
First-Class Mail	1.244	4.500	1.062	0.000	0.012	6.818
USPS Marketing Mail	1.244	4.500	1.062	0.000	0.010	6.816
Periodicals	1.244	4.500	1.062	2.000	0.002	8.808
Package Services	1.244	4.500	1.062	2.000	0.006	8.812
Special Services	1.244	4.500	1.062	0.000	0.007	6.813

Docket No. R2021-2, Order on Price Adjustments for First Class Mail, Etc., July 19, 2021, at 4 (Order No. 5937).

Inflation-based rate authority accounted for only approximately one-sixth of the total available rate authority, and that authority is longstanding and non-controversial among postal stakeholders. (Indeed, as the Commission is aware, many opponents of the new forms of pricing authority expressly upheld the legitimacy of inflation-based rate authority.) Moreover, inflation-based price authority in Docket No. R2021-2 was comparable in size to its level in the previous market-dominant price change proceeding, Docket No. R2021-1. Retirement obligation rate authority in Docket No.

R2021-2 was even smaller than the inflation-based rate authority available at that time. By contrast, density rate authority accounted for the majority of available pricing authority.

Absent the density authority, then, the "size and timing" of the rate adjustment about which the committee expresses concern, H.R. Rep. No. 117-79 at 100, would not have been remarkable. (With its reference to "7 percent," the committee does not appear to indicate concern with additional pricing authority for non-compensatory classes.)

The committee's apparent concern about the "size and timing" of the application of this density authority is both misdirected and misguided. For one thing, the size and timing of a rate adjustment are ultimately not decisions of the Commission. As the Commission has stated, "as a foundational matter, the Governors of the Postal Service, not the Commission, set the rates for postal services, while the Commission establishes and administers the regulatory system." Docket No. RM2017-3, Order Adopting Final Rules for the System of Regulating Rates and Classes for Market Dominant Products, Nov. 30, 2020, at 81 (Order No. 5763). Compare 39 U.S.C. § 404(b) with id. § 3622. In essence, the Commission's task is to delimit the Governors' pricing authority based on statutory criteria; within those bounds, decisions about price changes' size and timing are the exclusive responsibility of the Governors.

In this regard, it was clearly appropriate for the Commission to grant this authority to the Postal Service and for the Governors to fully exercise that authority. The density rate authority is designed to mitigate exogenous factors—volume loss and delivery-point growth—that the Commission found to have been key drivers of the Postal Service's financial losses: the only way for falling volume to cover the cost of a growing network, amid numerous statutory constraints on cost-cutting, is to raise revenue per piece. Docket No. RM 2017-3, Revised Notice of Proposed Rulemaking, Dec. 5, 2019, at 70–71 (Order No. 5337). In addition, market-dominant volume loss was in full force at the outset of the COVID-19 pandemic and contributed to net losses (excluding non-cash workers' compensation adjustments) of $7.571 billion in FY 2020 and $6.855 billion in FY 2021, despite competitive volume growth. (All but approximately one month of FY 2021 preceded implementation of the Docket No. R2021-2 price change.) U.S. Postal Service Form 10-K, Fiscal Year 2021, at 22. These losses continued a trend of a decade and a half of annual net losses by the Postal Service. A price correction via density rate authority was clearly necessary to address these financial problems.

Insofar as the committee report supposes that the density rate authority fails to account for package growth during the pandemic, that supposition is incorrect. For both FY 2020 and FY 2021, the Commission's density rate authority formula has focused on the change in total mail volume, thereby offsetting competitive volume growth against market-dominant volume decline and reducing the potential price increase needed from market-dominant mail to maintain coverage of network costs. Docket No. ACR2021, Determination of Available Market Dominant Rate Authority, Mar. 29, 2022, at 5 (Order No. 6130); Docket No. ACR2020, Determination of Available Market Dominant Rate Authority, Apr. 6, 2021, at 4 (Order No. 5861).

Moreover, the density rate authority is dynamic by design. As year-over-year volume losses abated after the initial COVID-19 drop-off, available density rate authority responded accordingly. In the very next (and most recent) rate adjustment, Docket No. R2022-1, the density rate authority dropped to 0.583 percent. Docket No. R2022-1, Order on Price Adjustments Etc., May 27, 2022, at 3 (Order No. 6188).

While the overall price changes in Docket No. R2022-1 were of comparable size to those in Docket No. R2021-2, id. at 2, more than half of the increase came from inflation-based pricing authority, which spiked from the previous 1.458 percent to 5.135 percent, id. at 3, much higher than the 4.500 percent density authority in Docket No. 2021-2 that provoked the committee's concern. As noted above, inflation-based pricing authority is both longstanding and well-accepted among postal stakeholders. Its role in price adjustments is rational, because general inflation raises the Postal Service's input costs (albeit at levels that exceed that rate of general inflation in some categories), and those costs, absent taxpayer subsidies, can be borne only through postal prices.

It is also improper to conclude, as the committee report appears to have done, that the density authority arose from an incomplete 10-Year Review that failed to take into account additional revenue earned by the Postal Service during the COVID 19 pandemic. This wholly misunderstands what the Commission did in the 10-Year Review. As discussed above, the density rate authority was designed to correct for key external drivers of the Postal Service's financial instability, and those drivers became more pronounced at the outset of the COVID-19 pandemic. Indeed, the Commission explicitly discussed the effects of the COVID-19 pandemic in relation to the need for density rate authority, finding that "as a result of the pandemic[,] there are fewer total mailpieces today over which the costs of servicing and maintaining the Postal Service's network can be distributed." Order No. 5763 at 28–29, 95. The Commission's approach and reasoning have been borne out by subsequent events.

In National Postal Policy Council v. Postal Regulatory Commission, 17 F.4th 1184 (D.C. Cir. 2021), a case decided shortly after the date of the committee report, the U.S. Court of Appeals for the D.C. Circuit rejected multiple challenges to the Commission's 10-Year Review rules. One in particular is relevant here. A group of mailing-industry associations maintained that density and other rate authorities given to the Postal Service were unnecessary because "'the pandemic has spurred massive volume increase in profitable packages, improving [the Postal Service's] financial condition overall.'" Id. at 1196 (brackets in original, citation omitted). The court rejected the challenge and upheld the new rate authorities, affirming the Commission's finding that the COVID 19 pandemic did not change the fact that the Postal Service's finances were unstable and that the "problems ... with respect to pricing and ... unreasonable rates have not abated[;] nothing specific to the pandemic alters [the Commission's] findings with regard to these deficiencies." Id. (citation omitted).

The same must be said for the reimbursement for COVID-19 related expenses that the Postal Service received from the CARES Act, Pub. L. No. 116-136, when it was enacted in March 2020. In fact, the Commission has already considered what the committee report is asking it to consider again.

Specifically, in the 10-Year Review, the Commission found that while the Postal Service had generally achieved short-term financial stability under the PAEA, it achieved neither medium-term nor long-term financial stability, due to a number of factors. Docket No. RM2017-3, Order on the Findings and Determination of the 39 U.S.C. § 3622 Review, Dec. 1, 2017, at 4 (Order No. 4257); Order No. 5763 at 5–7. The CARES Act provided the Postal Service with $10 billion in additional liquidity to reimburse the Postal Service for COVID-19 related expenses, but that money could not be used to address longer term financial needs. Order No. 5763 at 29–30; Pub. L. No. 116-136, § 6001(b)(1)(A)–(B). A one-time infusion for immediate operating expenses, however, while certainly generally helpful, could do nothing to address the Postal Service's longer-term financial stability, and it was to address those losses that the Commission adopted the density-based and other rate authorities. Order No. 5763 at 29–30; Docket No. RM2017-3, Order Denying Stay, Jan. 19, 2021, at 22–23 (Order No. 5818).

Although they are not explicitly the subject of the committee report's inquiry, subsequent events bear this conclusion out as well. Notwithstanding the passage of the Postal Service Reform Act (PSRA) and the additional relief it brought in the form of excusing past obligations for retiree health benefits, the PSRA alone does not make the Postal Service financially stable. For instance, while FY 2022 year-end financial reports are not yet available, the balance sheet as of September 30, 2021, showed current liabilities of $87.329 billion, compared to current assets of $25.908 billion. U.S. Postal Serv., FY2021 Form 10-K at 57. Cancelling the past-due retirement health benefit payments as of FY 2021 ($56.975 billion) would have reduced the current liabilities to $30.354 billion, still in excess of current assets.

More to the point, the Commission articulated the new pricing authorities as aimed at stabilizing net losses. Order No. 5337 at 13. Had the PSRA been in effect in FY 2021, the elimination of retiree health benefits payments would have reduced the $6.855 billion net loss (excluding non-cash workers' compensation adjustments) to a net loss of $1.745 billion. U.S. Postal Serv., FY2021 Form 10-K at 22, 67. Such a loss does not bespeak financial stability. For that reason, the Postal Service's comprehensive Delivering for America plan treats both the PSRA and judicious use of the new pricing authorities as essential building blocks of longer-term financial stability, along with operational efforts to reduce costs, increase efficiency, and grow revenue. U.S. Postal Serv., Delivering for America: Our Vision and Ten-Year Plan to Achieve Financial Sustainability and Service Excellence 38, 50 (2021). In sum, while the PSRA has helped to significantly improve the Postal Service's financial condition, its enactment does not mean that the Postal Service has attained financial stability or that the revenue increases to which the committee report points are somehow windfalls for the Postal Service. Challenges to the Postal Service's medium- and long-term financial stability remain.

Finally, the specific increases that have been implemented by the Postal Service since the new rules were put into place are directly advancing the goal of improving the Postal Service's financial position. In particular, the increases have significantly increased revenue from market-dominant products without causing any unanticipated volume declines.

Given the foregoing, the Postal Service believes that the Commission has already more than adequately considered and studied the factors stemming from the COVID 19 pandemic that led to increased revenues for the Postal Service. To the extent that the Commission wishes to address these factors further, events subsequent to the July 2021 date of the committee report bear out the Commission's findings.

Respectfully submitted,

Thomas J. Marshall

Thomas J. Marshall

From:	Jacob Newton
To:	Stakeholder Input
Cc:	Steve Johnson
Subject:	VMDAEC Comments in the Stakeholder Consultation Regarding Study on USPS Rate Increases
Date:	Friday, July 22, 2022 11:21:30 AM
Attachments:	Outlook-x0lc4uwx.png VMDAEC Comments on PRC Study on USPS Rate Increases.pdf

PRC Representative,

Please accept the attached letter as the Comments of Virginia, Maryland and Delaware Association of Electric Cooperatives in the "Stakeholder Consultation Regarding Study on USPS Rate Increases."

Please contact me should you have questions or require any additional clarification.

Regards,
Jacob

--

Association of Electric Cooperatives
Virginia, Maryland & Delaware
A Touchstone Energy® Cooperative

Jacob R. Newton
Director of Regulatory Affairs & Counsel
4201 Dominion Blvd., Suite 101, Glen Allen, VA 23060
Office: (804) 297-3488 | Cell: (434) 774-7859
Fax: (804) 346-3438 | Email: jnewton@vmdaec.com
Website: https://vmdaec.com/

Association of Electric Cooperatives
Virginia, Maryland & Delaware
A Touchstone Energy® Cooperative

Jacob R. Newton
DIRECTOR OF REGULATORY AFFAIRS & COUNSEL
Phone: (434) 774-7859 | Fax: (804) 346-3448
Email: jnewton@vmdaec.com

July 22, 2022

Michael M. Kubayanda
Chairman, Postal Regulatory Commission
901 New York Ave., N.W., Ste. 200
Washington, DC 20268

RE: Stakeholder Consultation Regarding Study on USPS Rate Increases

Dear Mr. Kubayanda:

The Virginia, Maryland, and Delaware Association of Electric Cooperatives (hereinafter, the "Association") by counsel, hereby submit these Comments in this Study on USPS Rate Increases.

The Association exists to serve the member-owned electric cooperatives in the three-state area. Thirteen co-ops in Virginia, one in Maryland, and one in Delaware are members of the Association. The Association also publishes Cooperative Living, a monthly magazine distributed to members of the Association's member cooperatives. Cooperative Living has the largest readership of any publication in Virginia, reaching more than 1.3 million readers in Virginia and Maryland. Cooperative Living is a vital part of how cooperatives communicate with their members—many of whom still do not have broadband. Cooperative Living features news and stories, essential notices for co-op members, and information about community resources and events.

The Association is a not-for-profit trade association for member-owned electric utility providers. As such, we have a financial responsibility to be good stewards of our budgets and are very sensitive to cost increases that could have negative impacts on our members. Therefore, the proposed increases to USPS rates will burden electric cooperatives and the members we serve.

The Association and rural America face significant detrimental impact across multiple programs from the already implemented and potential future postal rate increases. However, the cumulative impact of the persistent First-Class rate increases is well above recent increases in the Consumer Price Index. Similarly, the rate increase for periodicals is, on average, well above CPI trends. We note that Title 39 of the United States Code § 3622(d)(1) requires that market-dominant rates "shall … include an annual limitation on the percentage changes in rates … that will be equal to the change in the Consumer Price Index." Recent rate increases appear inconsistent with the statutory direction in Title 39 of the United States Code § 3622(d)(1).

We observe that these services are titled "Market Dominant"[1] for a reason – Postal Service customers, particularly those in rural America, often have no other options to deliver or receive periodicals and First-Class mail. As the Commission may be aware, the dearth of broadband service in rural America (which our organization and many others are working to address) precludes the use of electronic billing services and electronic delivery of periodicals or other important notices for many consumer members.

Cooperative mailings, including the magazines and bill inserts, provide members with critical information about their cooperatives, including information that can help consumers use energy more wisely, participate in cooperative energy management programs, learn about planned maintenance that may impact, and otherwise save money on their electric service. And, because cooperatives are not-for-profit and consumer-owned, they will be forced to pass on to those member-consumers the full cost of any postage rate increases.

Due to the aforementioned reasons, the Association urges the Commission consider the impact these rate increases will continue to have on rural America. Specifically, the Association

[1] *See* 39 U.S. Code § 3622(a).

urges the Commission to respond positively to the petition filed by the Alliance of Nonprofit Mailers on April 11, 2022, in Docket RM2022-5, urging the Commission to "revisit its regulations authorizing above-CPI rate increases."

We very much appreciate your acceptance of these Comments on behalf of Virginia's Electric Cooperatives. Should you require any additional information or clarification, please reach out.

Respectfully submitted,

THE VIRGINIA, MARYLAND &
DELAWARE ASSOCIATION OF ELECTRIC
COOPERATIVES

Jacob R. Newton

Counsel

From:	Phil Muddiman
To:	Stakeholder Input
Cc:	John Hamre
Subject:	Important Feedback on Above-Inflation Rate Hikes (Wounded Warrior Project)
Date:	Tuesday, July 19, 2022 3:23:56 PM
Attachments:	image001.png Alliance Alert Rate Hike WWP letter 7_18_22.pdf

Hello,

Attached is our letter from Wounded Warrior Project containing feedback on the rate increases that will lead to negatively impacting our ability to raise funds for awareness and reaching as many warriors as possible.

Respectfully,

JOHN HAMRE
direct response vice president

PHIL MUDDIMAN
Warrior Support
direct mail associate director

O: 904.646.6915
M: 904.760.2459

Wounded Warrior Project
4899 Belfort Road, Suite 300
Jacksonville, Florida 32256

Facebook | Twitter | YouTube
woundedwarriorproject.org

CONNECT » SERVE » EMPOWER

Choose Wounded Warrior Project® in your
Combined Federal Campaign (CFC) #11425

Wounded Warrior Project
4899 Belfort Road, Suite 300
Jacksonville, Florida 32256
O 904.296.7350
F 904.296.7347

WOUNDED WARRIOR PROJECT®

Wounded Warrior Project's (WWP) mission is to honor and empower wounded warriors. Our vision is to foster the most successful, well-adjusted generation of injured service members in our nation's history. We fulfill our mission and strive to meet our vision by connecting, serving, and empowering the wounded men and women who bravely volunteered to serve our nation on or after the events of September 11, 2001.

We connect warriors, their families, and caregivers to programs, peer groups, and community resources to ensure they have a readily available network of support. We serve by providing quality mental and physical health and wellness programs, career and VA benefits counseling, and ongoing support for the most severely injured. We empower warriors to live life on their own terms, mentor fellow veterans and service members, and embody the WWP logo by carrying one another on a path toward recovery.

Through June, 169,265 wounded warriors and 43,210 caregivers and family support members are registered with WWP, with access to free programs and services focused on connection, mental and physical health, financial wellness, and independence.
Wounded Warrior Project® (WWP) is transforming the way America's veterans are empowered, employed, and engaged in our communities. Our direct service programs focused on connection, independence, and mental, physical, and financial wellness create a 360-degree model of care and support. This holistic approach empowers warriors to create a life worth living and helps them build resilience, coping skills, and peer connection, which are known to reduce the risk of veteran suicide.

In WWP's fiscal year 2021, we mailed 110MM pieces, which generated $112MM in gross revenue and $57MM in net revenue. From the 110MM pieces mailed, we acquired 464,537 new donors, and reactivated 173,781 lapsed donors. The renewal program alone generated 1.9MM gifts. The support garnered in FY21, and every fiscal year, allows Wounded Warrior Project to further maximize their mission and vision.

Due to the recent postage increases and planned increases for the coming years, as well as increased production costs, we are being forced to mail flat volume to the prior fiscal year. This means that the file will not grow over the prior fiscal year, which will eventually lead to negative revenue implications for the organization. Reductions in funds raised will adversely impact our mission and ability to reach as many warriors as possible. Additionally, if costs continue to rise, we may be forced to make cuts in coming fiscal years.

We at WWP urge you to revisit regulations authorizing above-CPI rate increases, based on the negative impact it will have on WWP's services.

JOHN HAMRE

JOHN HAMRE
vice-president, direct response

From: Polly Papsadore, PMG
To: Stakeholder Input
Subject: Comments on Recent Rate Increases
Date: Sunday, July 31, 2022 10:58:28 PM

To The Postal Regulatory Commission,

Our company is seriously concerned about the recent postal rate increases and their negative impact on our nonprofit clients' direct mail fundraising programs.

Production Management Group (PMG) has provided direct mail production management services to nonprofits for over 25 years, primarily to support their fundraising and membership efforts. We work with scores of national and regional nonprofit organizations dedicated to saving lives, helping animals, protecting the environment, finding cures and more. Our nonprofit clients are providing direct services to those in need in communities nationwide and operate with much greater efficiency than government entities – which has become especially apparent during the pandemic. Our country needs a healthy and effective nonprofit sector.

The PRC and the USPS, especially in this age of corporate social responsibility, should support nonprofit direct mail fundraising efforts by offering the lowest postage rates possible.

Why are nonprofits so dependent upon economical direct mail programs?

- The vast majority of revenue for most nonprofits is generated through direct mail.
- Direct mail provides a predictable revenue stream for nonprofits.
- Net income (which is significantly impacted by postage costs, the most expensive line item in direct mail campaigns) supports mission activities.
- Acquiring donors through the mail is essential to the long term health of nonprofit fundraising programs.

Direct mail provides a pipeline of future major donors and bequests. A large national nonprofit study from AnalyticalOnes indicates:

- One-in-six of first gifts from $2,500+ donors was through traditional direct mail acquisition
- One-in-four of first gifts from $1,000-$2,500 donors was through direct mail acquisition

Major donors making large gifts don't appear out of thin air – a significant percentage of these donors first learn about nonprofits through direct mail.

Industry research also shows:

- 50% - 70+% of planned gifts (will bequests, etc.) were originally direct marketing donors
- 60%-80% of planned gifts originated with giving less than $25 (through the mail.)

Nonprofits are dependent upon direct mail fundraising to build and grow their donor bases and to raise funds to conduct their missions. Continuous postage rate increases threaten their ability to plan and execute strong direct mail programs. Many nonprofits are seriously considering cutting back on larger volume acquisition efforts, and in fact many are already focusing instead on digital channels for acquisition.

Please consider offering nonprofit organizations reduced postage rates moving forward. It's the right thing to do.

Sincerely,

Polly Papsadore and the PMG Team

Polly Papsadore
Senior Vice President of Business Strategy
D 443.539.2603 | F 410.290.1578
C 508.737.5531 | O 410.290.0667 x 2603

PMG
7160 Columbia Gateway Drive, Suite 300
Columbia, MD 21046
www.pmgdirect.net

An Employee-Owned Company

Advocating for our clients every day.

From: steve@nonprofitmailers.org
To: Stakeholder Input
Subject: Stakeholder Input
Date: Sunday, July 31, 2022 6:37:11 PM
Attachments: image007.png
image008.png
image009.png

Dear Commissioners:

Thank you for asking for input from stakeholders in the United States Postal Service. The Alliance of Nonprofit Mailers is deeply concerned that the above-inflation postage rate increases allowed under your new rules will have a long-term detrimental effect on the nonprofit sector.

We urged our members to write to you about the impact of these rate increases on their organizations, most of which rely heavily on USPS mail services. We believe that while they have a reliance on mail in common, each nonprofit has its own story.

The aggregate price elasticity data that USPS provides the Commission does not tell the full story and it is based on outdated historical experience. Over the past many years, postal rates have tracked inflation which has been subdued. Now rates are increasing more than inflation which itself has reached 40-year highs. The historical elasticity relationships might seem to continue to work in the very short term, but they are irrelevant to the long term.

We are aware that many internal strategic discussions are taking place that will lead to accelerated erosion in the use of mail. The damage will extend far beyond the finances of one government agency to negatively affect the missions of many essential nonprofit organizations.

We agree with the House of Representatives Report 117-79 that many relevant factors have changed since the Commission closed the record on the ten-year rate review. USPS is much more financially stable and does not need the full rate authority it is using to the detriment of America's nonprofit mailers. It certainly does not need to raise rates twice a year.

We suggest that you must ensure not just the financial health of the USPS agency, but also the impact of your actions on the health of the mailers that rely on USPS to provide affordable, reliable services. It also is your responsibility to regulate USPS costs and not try to fix non-compensatory cost coverage with rate increases alone.

Thank you for considering these thoughts as well as the comments sent in by nonprofit mailers. We have in common with you the need to ensure a secure USPS without unnecessarily damaging the mailers that rely on it.

Sincerely,

Stephen Kearney

Stephen Kearney

Executive Director
Alliance of Nonprofit Mailers
Nonprofits advocating for affordable, reliable mail.

Phone: 202.360.3776
Email: steve@nonprofitmailers.org

2021 L Street, NW, Suite 101-248
Washington, DC 20036

www.NonprofitMailers.org

From:	Lynn Allen
To:	Stakeholder Input
Subject:	USPS Rate Increases
Date:	Sunday, July 31, 2022 6:34:03 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Lynn Allen
330 Chidester St
Ypsilanti, MI 48197

From: Maria Barlupo
To: Stakeholder Input
Subject: Study on USPS Rate Increases
Date: Sunday, July 31, 2022 6:16:27 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Maria Barlupo
8649 Canepa Rd
Stockton, CA 95212

From:	Teresa Cowan
To:	Stakeholder Input
Subject:	Study on USPS Rate Increases
Date:	Sunday, July 31, 2022 3:29:14 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Teresa Cowan
2918 E 8th St
Casper, WY 82609

From:	MaryCaroline Shown
To:	Stakeholder Input
Subject:	Stop Postage Hikes
Date:	Sunday, July 31, 2022 12:31:36 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,

MaryCaroline Shown
8457 Whitehawk Lp
Blacklick, OH 43004

From: Barbara Marino
To: Stakeholder Input
Subject: Stop Postage Hikes
Date: Saturday, July 30, 2022 1:51:49 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Barbara Marino
97 Twin Lakes Dr
Fairfield, OH 45014

From:	Keith Aitken
To:	Stakeholder Input
Subject:	USPS Rate Increases
Date:	Saturday, July 30, 2022 12:06:14 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Keith Aitken
20 Boston Ivy Rd
Levittown, PA 19057

From: Janice Fredrickson
To: Stakeholder Input
Subject: USPS Rate Increases
Date: Saturday, July 30, 2022 11:18:36 AM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Janice Fredrickson
22008 432nd St
Zumbrota, MN 55992

From: Anne Green
To: Stakeholder Input
Subject: Stop Postage Hikes
Date: Saturday, July 30, 2022 10:39:06 AM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Anne Green
158 Lakeview Dr
Whitney, TX 76692

From:	Tiffany Stutheit
To:	Stakeholder Input
Subject:	USPS Rate Increases
Date:	Saturday, July 30, 2022 10:18:18 AM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Tiffany Stutheit
128 Waterscapes Dr
Pike Road, AL 36064

From:	Millie Pontious
To:	Stakeholder Input
Subject:	Study on USPS Rate Increases
Date:	Saturday, July 30, 2022 9:19:43 AM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Millie Pontious
3395 Polley Rd
Columbus, OH 43221

From: Janet Woodall
To: Stakeholder Input
Subject: Stop Postage Hikes
Date: Saturday, July 30, 2022 3:41:34 AM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Janet Woodall
Wilton Rigsby Rd
GA 39840

From: Deborah Tripoldi
To: Stakeholder Input
Subject: Study on USPS Rate Increases
Date: Saturday, July 30, 2022 12:55:38 AM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Deborah Tripoldi
54 Grant Ave
Nutley, NJ 07110

From: Ellen Mack
To: Stakeholder Input
Subject: Stop Postage Hikes
Date: Saturday, July 30, 2022 12:55:16 AM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Ellen Mack
7086 Oak Tree Dr S
Lorain, OH 44053

From:	Rev. Pullen
To:	Stakeholder Input
Subject:	Study on USPS Rate Increases
Date:	Saturday, July 30, 2022 12:53:26 AM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Rev. Pullen
2651 Audubon Rd
Columbus, OH 43211

From: Barry Eldred
To: Stakeholder Input
Subject: Study on USPS Rate Increases
Date: Saturday, July 30, 2022 12:30:21 AM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Barry Eldred
31 Hunt Rd
Freehold, NJ 07728

From: Nan Beatty
To: Stakeholder Input
Subject: USPS Rate Increases
Date: Friday, July 29, 2022 11:51:16 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Nan Beatty
6304 Sisters Ln
Raleigh, NC 27603

From: Sandy Gese
To: Stakeholder Input
Subject: USPS Rate Increases
Date: Friday, July 29, 2022 9:00:45 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Sandy Gese
419 Main St
Ione, WA 99139

From:	Anna Politano
To:	Stakeholder Input
Cc:	steve@nonprofitmailers.org
Subject:	Postal Rate Increase for Oklahoma"s electric cooperative"s trade publication, Oklahoma Living magazine
Date:	Friday, July 29, 2022 5:55:19 PM
Attachments:	image002.png
Importance:	High

Dear Commissioners,

I am writing on behalf of Oklahoma's 30 non-profit electric cooperatives and as publisher of *Oklahoma Living* magazine, the chief means of communication with the 523,000-plus electric cooperative members in the state. The back-to-back rate increases of 2021 and 2022 will cause us to raise the cost of *Oklahoma Living* to our subscribers in a significant manner.

This directly impacts the electric cooperative ability to provide timely information to consumer-members on matters of importance, including legal notices for board nominations, notices of annual meetings, rebates for energy efficient appliances, peak alert announcements and more. In my 12 years with the magazine, I have never seen postal rates rise this much and this often. These come at a time when printed publications also are facing monthly increases in the price of paper and ink.

Oklahoma Living is part of a network of electric cooperative publications that together reach more than 9.8 million American households, making it the fourth largest magazine network in the United States. Collectively, cooperative magazines contribute to the USPS close to $40 million per year. What's more, our circulation continues to increase as more and more homes and businesses are built in rural areas. It's one of the few growth areas the USPS can count on these days.

The effect of these continued increases in expenses is a push from our cooperative owners to shift from a printed publication to online magazines. Already every statewide, rural electric publication has a digital counterpart to its mailed copy. As more and more rural people find access to high-speed internet, the possibility of ending the mailed piece in favor of a digital magazine is becoming a reality.

These continued increases are driving discussion of ending our relationship with the USPS. Please consider how the loss of $40 million per year in income will affect the services the USPS provides. There are consequences to all actions, and that is certainly the case with these rate increases.

For these reasons, Oklahoma's electric cooperatives join the National Rural Electric Cooperative Association (NRECA) and the Alliance of Nonprofit Mailers in urging you to deny or significantly reduce further rate increases.

I appreciate your consideration of our situation.

Respectfully submitted,

Anna Politano I **Director of Public Relations & Communications**
Certified Cooperative Communicator
Oklahoma Association of Electric Cooperatives
Oklahoma Living magazine
Mailing: P.O. Box 54309 I OKC-OK I 73154-1309
Shipping: 2325 E. I-44 Service Rd. I OKC-OK I 73111
D: 405-607-0160 I C: 405-761-0289 I F: 405-478-0246
www.oaec.coop I www.okl.coop

From:	Elaine Russow
To:	Stakeholder Input
Subject:	Stop Postage Hikes
Date:	Friday, July 29, 2022 5:53:46 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Elaine Russow
333 S Eaton St
Lakewood, CO 80226

From:	Nancy Pichiotino
To:	Stakeholder Input
Subject:	USPS Rate Increases
Date:	Friday, July 29, 2022 5:48:15 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Nancy Pichiotino
120 Via San Carlos
Paso Robles, CA 93446

From:	Faith Roseberry
To:	Stakeholder Input
Subject:	USPS Rate Increases
Date:	Friday, July 29, 2022 5:44:40 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Faith Roseberry
3651 E March Pl
Tucson, AZ 85713

From:	Carol Spencer
To:	Stakeholder Input
Subject:	Stop Postage Hikes
Date:	Friday, July 29, 2022 5:23:53 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Carol Spencer
1710 18th Ave
Sterling, IL 61081

From:	Wendy Gardner
To:	Stakeholder Input
Subject:	USPS Rate Increases
Date:	Friday, July 29, 2022 5:19:29 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Wendy Gardner
61.5 Lowell St
Methuen, MA 01844

From:	Carla Williams
To:	Stakeholder Input
Subject:	Stop Postage Hikes
Date:	Friday, July 29, 2022 4:22:32 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Carla Williams
1490 Jason Lee Ave
Cottage Grove, OR 97424

From: Judy Cohen
To: Stakeholder Input
Subject: USPS Rate Increases
Date: Friday, July 29, 2022 4:11:01 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Judy Cohen
4475 E Knox Rd
Phoenix, AZ 85044

From: Chandra Bender
To: Stakeholder Input
Subject: Study on USPS Rate Increases
Date: Friday, July 29, 2022 3:51:43 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Chandra Bender
3 Weathers Rd
Hattiesburg, MS 39402

From:	Tim Johnson
To:	Stakeholder Input
Cc:	Jon Downing
Subject:	rate hikes above the rate of inflation
Date:	Friday, July 29, 2022 3:49:22 PM
Attachments:	image001.png

To whom it may concern:
Impact is printer/mailer/direct marketing company located in Minneapolis, MN. Every year we mail 10's of millions of bills and 100's of millions of pieces of marketing mail for our clients. We employ approximately 200 people. We want the USPS and our clients to thrive. Direct Mail is one of many marketing channels for our clients. Their customers' follow numerous different paths to purchase. We help our clients practice direct marketing more effectively.

Our clients make marketing related decisions every day and they tend to build their marketing budgets annually. Multiple postage increases each year make their budget planning more difficult. Our clients expect results from their direct marketing investment. Increasing postage above the rate of inflation causes other marketing channels to become more attractive and it results in our customers asking us to print and mail few pieces for them. Again, we want both the USPS and our clients to thrive.

Sincerely, Tim Johnson

Tim Johnson | CEO

Impact
Power to Connect

4600 Lyndale Avenue North | Minneapolis, MN 55412
Direct: 612-638-1426
www.ImpactConnects.com

From: Leah Holsten
To: Stakeholder Input
Subject: Study on USPS Rate Increases
Date: Friday, July 29, 2022 3:31:17 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Leah Holsten
518 N Kimbrel Ave
Panama City, FL 32404

From: Wanda Dalesandro
To: Stakeholder Input
Subject: Stop Postage Hikes
Date: Friday, July 29, 2022 3:17:07 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Wanda Dalesandro
104 Ford St
Golden, CO 80403

From:	Joanne Bunn
To:	Stakeholder Input
Subject:	Stop Postage Hikes
Date:	Friday, July 29, 2022 2:32:30 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Joanne Bunn
20431 Dawn Ave
Tehachapi, CA 93561

From:	Sandra Rubin-Wright
To:	Stakeholder Input
Subject:	Study on USPS Rate Increases
Date:	Friday, July 29, 2022 2:28:04 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Sandra Rubin-Wright
11663 Bowen Rd
Mantua, OH 44255

From:	Neill Smith
To:	Stakeholder Input
Subject:	Stop Postage Hikes
Date:	Friday, July 29, 2022 2:11:27 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Neill Smith
404 N Ash St
Cortez, CO 81321

From: Aaron Brant
To: Stakeholder Input
Subject: Study on USPS Rate Increases
Date: Friday, July 29, 2022 2:00:55 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Aaron Brant
17905 Sweet Gum Ct
Reno, NV 89508

From:	Glenda O"Dell
To:	Stakeholder Input
Subject:	Study on USPS Rate Increases
Date:	Friday, July 29, 2022 1:54:05 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Glenda O'Dell
70 Mount Vernon Heights
Hurricane, WV 25526

From: Bob Poropatich
To: Stakeholder Input
Subject: USPS Rate Increases
Date: Friday, July 29, 2022 1:51:35 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Bob Poropatich
5148 Rosecrest Pl
Pittsburgh, PA 15201

From: Vickry Kayser
To: Stakeholder Input
Subject: Stop Postage Hikes
Date: Friday, July 29, 2022 1:20:30 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Vickry Kayser
3050 Mallard Dr
Colorado Springs, CO 80910

From: Mona Neeley
To: Stakeholder Input
Cc: steve@nonprofitmailers.org; Scot R. Hoffman
Subject: Unreasonable postage increases
Date: Friday, July 29, 2022 1:11:38 PM

Chairman Michael M. Kubayanda

Vice Chairman Ann C. Fisher

Commissioner Mark Acton

Commissioner Ashley E. Poling

Commissioner Robert Taub

Postal Regulatory Commission

901 New York Avenue, NW, Suite 200

Washington, DC 20268

Today, I am writing on behalf of Colorado's 22 non-profit electric cooperatives and as publisher and editor of *Colorado Country Life* magazine, our state's electric co-op magazine. The proposed January 22, 2023, postage increase will affect communication for all our co-ops as they utilize the mail to reach out to their roughly 500,000 consumer-members across the state. It will particularly affect the 15 co-ops that mail more than 205,000 issues of their magazine to their consumer-members each month.

For those 15 co-ops, our monthly magazine is the chief means of communication with their cooperative members in the state. The back-to-back rate increases of 2021 and 2022 will force us to substantially raise the cost of *Colorado Country Life* to our subscribers. This is not good news for our member cooperatives, not for profit organizations that serve Colorado's poorest counties and operate on slim margins.

Raising postal costs yet again will directly impact the co-ops' ability to provide important and timely information to their electric cooperative members, including legal notices for board nominations, notices of annual meetings, rebates for energy efficient appliances, how to get assistance with their bills, safety reminders and more.

In my 28 years with the magazine, I have never seen postal rates rise this much and this often. These come at a time when printed publications also are facing monthly increases in the price of paper and ink. The combination is threatening communication between co-ops and their members in new and difficult ways.

I am not alone in my concern about this unprecedented rate increase. *Colorado Country Life* is part of a network of electric cooperative publications that together reach more than 9.8 million American households, making it the fourth largest magazine network in the United States. Payments for Colorado's magazine mailing in 2022 alone are expected to total $498,000 in 2022 and I estimate that will rise to $542,820 in 2023. Considering the other electric cooperative magazines also pay the USPS a similar amount, our contribution to the USPS is close to $40 million per year. What's more, our circulation continues to increase as more and more homes and businesses are built in rural areas. It's one of the few growth areas the USPS can count on these days.

Because of these continued increases, we are more requests from our cooperative owners to shift from a printed publication to online magazines. These incessant increases are pushing us to explore these other options. Please reconsider this path and think about how the loss of $40 million per year in income will affect the services the USPS provides.

____

Mona Neeley
Director of Communications
Colorado Rural Electric Association
Publisher/Editor
Colorado Country Life

5400 Washington St.
Denver, CO 80216

303-455-4111 (CCL)
720-407-0713 (direct)
mneeley@coloradocountrylife.org

www.crea.coop
www.coloradocountrylife.org

From:	Nichole Johnson
To:	Stakeholder Input
Subject:	USPS Rate Increases
Date:	Friday, July 29, 2022 1:07:01 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Nichole Johnson
95 Calpine Ave
Calpine, CA 96124

From:	Carrie Konieczny
To:	Stakeholder Input
Subject:	USPS Rate Increases
Date:	Friday, July 29, 2022 12:40:15 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Carrie Konieczny
16 Anthony Dr
Depew, NY 14043

From: Duggan, Martha A.
To: Stakeholder Input
Subject: Postal Rate Increase impacts on rural electric cooperatives
Date: Friday, July 29, 2022 11:51:47 AM

Chairman Michael M. Kubayanda
Vice Chairman Ann C. Fisher
Commissioner Mark Acton
Commissioner Ashley E. Poling
Commissioner Robert Taub
Postal Regulatory Commission
901 New York Avenue, NW, Suite 200
Washington, DC 20268

Via E-mail to Stakeholder

Input@PRC.gov

Dear Commissioners:

The National Rural Electric Cooperative Association (NRECA) writes to you today to let you know of the significant and deleterious impact of recent postal rate increases on rural America.

NRECA is the national trade association representing nearly 900 local electric cooperatives and other rural electric utilities. America's electric cooperatives are owned by the people that they serve and comprise a unique sector of the electric industry. From growing regions to remote farming communities, electric cooperatives power 1 in 8 Americans and serve as engines of economic development for 42 million Americans.

Electric cooperatives operate at cost and without a profit incentive. NRECA's member cooperatives include 62 generation and transmission (G&T) cooperatives and 831 distribution cooperatives. *All but three of these 893 electric cooperatives are classified as small businesses*. Both distribution and G&T cooperatives share an obligation to serve their members by providing safe, reliable, and affordable electric service.

America's electric cooperatives provide electric service in 364 (92%) of the Persistent Poverty Counties identified by the U.S. Treasury Community Development Financial Institutions Fund (CDFI). More than 250 distribution cooperatives and NRECA-member public power districts serve an estimated 4.2 million people in these counties, with poverty rates ranging from 20% to over 60%. These communities and their members are reeling from the pandemic, supply chain shortages (and attendant price increases) and general inflation as experienced in prices for food, shelter, and gasoline, to mention a few.

As not-for-profit, consumer-owned, and consumer-governed organizations, electric cooperatives utilize mail for many reasons, including distributing cooperative magazines (read by approximately 36 million people) to member-consumers in 42 states and sending bills to member-consumers using First-Class Mail.

Cooperative mailings, including the magazines and bill inserts, provide members with critical information about their cooperatives, including information that can help consumers use energy more wisely, participate in cooperative energy management programs, learn about planned maintenance that may impact service, and otherwise save money on their electric service. Because cooperatives are not-for-profit and consumer-owned, they have been forced to pass on to those member-consumers the full cost of recent postage rate increases.

The Biden Administration has announced initiatives to promote equity to underserved communities in its Executive Order 13985. The Executive Order includes the following in the definition of underserved communities: "…persons who live in rural areas; and persons otherwise adversely affected by persistent poverty or inequality." Counter to this policy prerogative, the rate increases for First-Class postage and periodicals have exacerbated inequity and poverty in rural America. While the Postal Regulatory Commission (Commission) has recognized the importance of postal *service* to rural America, we urge you to consider the impact these *rate increases* are having on rural America.

We note that the negative impacts predicted in comments we and others filed previously with the Commission have come true. We respectfully request that you revisit and significantly decrease recent rate increases. Thank you for your consideration.

Respectfully Submitted,

Martha Duggan, CLCP
Senior Director, Regulatory Affairs| National Rural Electric Cooperative Association
4301 Wilson Blvd., Arlington, VA 22203
o: 703.907.5848 m: 202.271.4395 f: 703.907.5517
E electric.coop | **T** Follow | **Y** Watch | **F** Like | **I** View | **in** Connect

From:	Virginia Caraco
To:	Stakeholder Input
Subject:	USPS Rate Increases
Date:	Friday, July 29, 2022 11:37:25 AM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Virginia Caraco
200 Poplar Ln
Camden, SC 29020

From:	Allie Barkalow
To:	Stakeholder Input
Subject:	Study on USPS Rate Increases
Date:	Friday, July 29, 2022 11:17:47 AM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Allie Barkalow
306 Mendocino Ave
Santa Rosa, CA 95401

From: Allie Barkalow
To: Stakeholder Input
Subject: Stop Postage Hikes
Date: Friday, July 29, 2022 11:14:05 AM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Allie Barkalow
306 Mendocino Ave
Santa Rosa, CA 95401

From: Sandra Aggen
To: Stakeholder Input
Subject: USPS Rate Increases
Date: Friday, July 29, 2022 11:08:27 AM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Sandra Aggen
7921 N 145th E Pl
Owasso, OK 74055

From:	K. Dallman
To:	Stakeholder Input
Subject:	USPS Rate Increases
Date:	Friday, July 29, 2022 10:41:49 AM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
K. Dallman
PO Box 4047
Lawrence, KS 66046

From: Lita Stacey
To: Stakeholder Input
Subject: USPS Rate Increases
Date: Friday, July 29, 2022 10:27:26 AM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Lita Stacey
665 Fresnillo Dr
Brownsville, TX 78526

From: Carl Werner
To: Stakeholder Input
Subject: Study on USPS Rate Increases
Date: Friday, July 29, 2022 10:13:31 AM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Carl Werner
104 Ferndale Dr
Wakeman, OH 44889

From: Madeline Pearson
To: Stakeholder Input
Subject: USPS Rate Increases
Date: Friday, July 29, 2022 10:12:07 AM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Madeline Pearson
4232 53rd Ave W
Bradenton, FL 34210

From: Susan Tavaglione
To: Stakeholder Input
Subject: USPS Rate Increases
Date: Friday, July 29, 2022 10:06:22 AM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Susan Tavaglione
605 8th St
New Bern, NC 28560

From: L Neer
To: Stakeholder Input
Subject: Stop Postage Hikes
Date: Friday, July 29, 2022 9:24:37 AM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
L Neer
1735 Bellaire St
Denver, CO 80220

From: Kelly Farabaugh
To: Stakeholder Input
Subject: Study on USPS Rate Increases
Date: Friday, July 29, 2022 8:41:09 AM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Kelly Farabaugh
3605 Willett Rd
Pittsburgh, PA 15227

From: Sally Herrington
To: Stakeholder Input
Subject: USPS Rate Increases
Date: Friday, July 29, 2022 8:27:24 AM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Sally Herrington
131 Rockshire Dr
Janesville, WI 53546

From: ronald hager
To: Stakeholder Input
Subject: Stop Postage Hikes
Date: Friday, July 29, 2022 8:05:26 AM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
ronald hager
5394 Fayette Rd
New London, OH 44851

From:	Brenda Moniz
To:	Stakeholder Input
Subject:	Study on USPS Rate Increases
Date:	Friday, July 29, 2022 8:04:22 AM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Brenda Moniz
152 Great Neck Rd
Wareham, MA 02571

From: Jan Beeney
To: Stakeholder Input
Subject: Study on USPS Rate Increases
Date: Friday, July 29, 2022 7:40:34 AM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Jan Beeney
414 Gerty St
Atwood, OK 74827

From:	Priscilla Lytle
To:	Stakeholder Input
Subject:	Stop Postage Hikes
Date:	Friday, July 29, 2022 7:39:50 AM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Priscilla Lytle
1031 Fox Ave SE
Paris, OH 44669

From: JEWEL HUDSIB
To: Stakeholder Input
Subject: USPS Rate Increases
Date: Friday, July 29, 2022 5:34:46 AM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
JEWEL HUDSIB
465 Gypsy Ln
Youngstown, OH 44504

From:	Jesus Aguirre
To:	Stakeholder Input
Subject:	USPS Rate Increases
Date:	Friday, July 29, 2022 4:51:02 AM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Jesus Aguirre
1299 Honeycutt Rd
NC 27592

From:	Kathleen Margulis
To:	Stakeholder Input
Subject:	Study on USPS Rate Increases
Date:	Friday, July 29, 2022 1:40:36 AM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Kathleen Margulis
31 Wedgewood Ln
Brookhaven, NY 11719

From:	Rhonda Williams
To:	Stakeholder Input
Subject:	USPS Rate Increases
Date:	Friday, July 29, 2022 1:22:15 AM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Rhonda Williams
3630 W Arrowwood Pl
Tucson, AZ 85741

From:	Orlin Buente
To:	Stakeholder Input
Subject:	Study on USPS Rate Increases
Date:	Friday, July 29, 2022 1:18:46 AM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Orlin Buente
119 N 5620W Rd
Kankakee, IL 60901

From:	Roberta Jacobs
To:	Stakeholder Input
Subject:	USPS Rate Increases
Date:	Friday, July 29, 2022 12:34:36 AM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Roberta Jacobs
13603 Budd Rd
Burt, MI 48417

From:	Kathy Distel
To:	Stakeholder Input
Subject:	Study on USPS Rate Increases
Date:	Thursday, July 28, 2022 11:56:46 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Kathy Distel
326 Quarry Branch Rd
Catlettsburg, KY 41129

From:	Carol Berkowicz
To:	Stakeholder Input
Subject:	Study on USPS Rate Increases
Date:	Thursday, July 28, 2022 11:23:37 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Carol Berkowicz
47 Milliken St
Old Orchard Beach, ME 04064

From:	Paula Renka
To:	Stakeholder Input
Subject:	Stop Postage Hikes
Date:	Thursday, July 28, 2022 11:16:22 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Paula Renka
Pigeon View St
Round Rock, TX 78665

From: Madrienne Petitjean
To: Stakeholder Input
Subject: Stop Postage Hikes
Date: Thursday, July 28, 2022 11:06:39 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Madrienne Petitjean
11118 Cornalee Ct
Richmond, TX 77407

From:	Catina Lee
To:	Stakeholder Input
Subject:	Study on USPS Rate Increases
Date:	Thursday, July 28, 2022 10:53:23 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Catina Lee
5705 S Artesian Ave
Chicago, IL 60629

From:	James Skubal
To:	Stakeholder Input
Subject:	Stop Postage Hikes
Date:	Thursday, July 28, 2022 10:43:48 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
James Skubal
4287 Shepard Lake Rd
Rhinelander, WI 54501

From: Sandy Meade
To: Stakeholder Input
Subject: USPS Rate Increases
Date: Thursday, July 28, 2022 10:38:50 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Sandy Meade
308 Leafwood Rd
Tarpon Springs, FL 34689

From: Mary Wickman
To: Stakeholder Input
Subject: Study on USPS Rate Increases
Date: Thursday, July 28, 2022 10:24:08 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Mary Wickman
8544 Hwy 6
Clifton, TX 76634

From: Diana Fraley
To: Stakeholder Input
Subject: Stop Postage Hikes
Date: Thursday, July 28, 2022 10:21:35 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Diana Fraley
2759 S Riverside Dr
Beloit, WI 53511

From: Lynn McMillen
To: Stakeholder Input
Subject: Stop Postage Hikes
Date: Thursday, July 28, 2022 10:20:55 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Lynn McMillen
8696 Edelweiss Rd
New Tripoli, PA 18066

From: Dayle Severns
To: Stakeholder Input
Subject: Stop Postage Hikes
Date: Thursday, July 28, 2022 10:20:36 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Dayle Severns
3348 Dreaming Creek Rd
Concord, VA 24538

From:	Opal Dehart
To:	Stakeholder Input
Subject:	Study on USPS Rate Increases
Date:	Thursday, July 28, 2022 10:09:24 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Opal Dehart
719 Eden Terrace
Archdale, NC 27263

From:	Judy Orcutt
To:	Stakeholder Input
Subject:	Stop Postage Hikes
Date:	Thursday, July 28, 2022 9:55:07 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Judy Orcutt
1 Falkland Ave
Pooler, GA 31322

From: Ann Pettee
To: Stakeholder Input
Subject: Study on USPS Rate Increases
Date: Thursday, July 28, 2022 9:43:27 PM

Secretary Barker:

Please take action! There are people who rely on an affordable postal service! I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Ann Pettee
5328 Wood Dale Dr
Dayton, OH 45414

From: Connie Olson
To: Stakeholder Input
Subject: USPS Rate Increases
Date: Thursday, July 28, 2022 9:43:26 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law. DeJoy needs to be replaced ASAP!

Thank you,
Connie Olson
444 K St
Gering, NE 69341

From:	Wayne Coltrane
To:	Stakeholder Input
Subject:	Study on USPS Rate Increases
Date:	Thursday, July 28, 2022 9:43:26 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. Service has and continues to decline with deliveries to wrong addresses, lost mail, and damaged mail. Employees at post offices are rude and condescending to customers. Clerks pressure customers to purchase services they don't need or require. The American people deserve to gain from postal reform and due to the aforementioned a reduction in postal rates should be considered.

Sincerely
Wayne Coltrane
6904 Wesson Dr
Plano, TX 75023

From:	Michael Russell
To:	Stakeholder Input
Subject:	USPS Rate Increases
Date:	Thursday, July 28, 2022 9:43:26 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law. Please get all Trump appointees out of Postal Management

Thank you,
Michael Russell
510 Liberator
Gwinn, MI 49841

From:	C Rosati
To:	Stakeholder Input
Subject:	Study on USPS Rate Increases
Date:	Thursday, July 28, 2022 9:43:25 PM

Secretary Barker:

I want to see Mr. DeJoy removed from the postal system entirely. He has created nothing but havoc in the Lehigh Valley where we sometimes get mail only once or twice a week! And then I also get third class mail that is already a week or more obsolete by the time he gets here. A year or a little more ago he removed sorting machines from our nearest postal facility and took them to another city to sit and then be dismantled. No wonder there's Problems with delivery. I have lived In this area all my life, 70 years. I have never seen a mess like what has occurred since he's been in control. I don't wanna see any part of his plans put in force. They are destructive.

Sincerely
C Rosati
220 E Union St
Allentown, PA 18109

From: David Goldschmidt
To: Stakeholder Input
Subject: Study on USPS Rate Increases
Date: Thursday, July 28, 2022 9:43:25 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Thank you for your time and consideration.

Sincerely
David Goldschmidt
2 Venture
Irvine, CA 92618

From:	James McNally
To:	Stakeholder Input
Subject:	Study on USPS Rate Increases
Date:	Thursday, July 28, 2022 9:43:24 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform. The USPS is losing leverage with existing business with pricing and not competitive in many areas of the package business. Frequent rate hikes are causing our customers to move to other carriers including the upcoming regional carrier market.

Sincerely
James McNally
30095 Tammy Ct
DE 19975

From:	Ellen Klein
To:	Stakeholder Input
Subject:	Study on USPS Rate Increases
Date:	Thursday, July 28, 2022 9:43:24 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform. Half the time I don't even get mail, or it comes after 6 pm. I have also had times when bills were not received by various companies and I grow late fees.

Sincerely
Ellen Klein
1104 S Park Ave
Haddon Heights, NJ 08035

From:	janice buck
To:	Stakeholder Input
Subject:	Stop Postage Hikes
Date:	Thursday, July 28, 2022 9:43:24 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.
Please! We publish a small rural newspaper which cannot suffer another increase. We have had two (2) increases each year the past two years. Enough is enough!

Thank you,
janice buck
506 Beckwith Rd
Loyalton, CA 96118

From:	Shawn Brown
To:	Stakeholder Input
Subject:	USPS Rate Increases
Date:	Thursday, July 28, 2022 9:43:24 PM

Dear Secretary Barker:

Please read this well written form letter below aloud. It expresses my thoughts and concerns.

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Shawn Brown
487 Dallas St
New Braunfels, TX 78130

From: Jane"e Taylor
To: Stakeholder Input
Subject: Stop Postage Hikes
Date: Thursday, July 28, 2022 9:43:24 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary because of the funds now available due to the Postal Service Reform Act, and would serve only to push ever more financial burden on the American people.

Thank you,
Jane'e Taylor
805 Powell Rd
Mesquite, TX 75149

From: Kathy Bergeron
To: Stakeholder Input
Subject: Stop Postage Hikes
Date: Thursday, July 28, 2022 9:43:24 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary. There are many of us who still utilize the USPS and in these times, this insane increase is making things even harder for many.

Thank you,
Kathy Bergeron
501 N Cloud St
Clark, SD 57225

From: Anita Palladino
To: Stakeholder Input
Subject: Louis Dejoy and study on USPS Rate Increases
Date: Thursday, July 28, 2022 9:43:23 PM

Secretary Barker:

Before even getting to the main point, I would like to know why that lying thief Louis Dejoy, still has a job. He is not fit to clean street garbage. His mission is to destroy, and this is his latest attack.
I think someone needs to wake Biden and show him what Dejoy is doing.
Further, I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Anita Palladino
321 Myrtle Dr
Nokomis, FL 34275

From: Carla Fox
To: Stakeholder Input
Subject: USPS Rate Increases
Date: Thursday, July 28, 2022 9:43:23 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

This is why people minimize using the postal service.

Thank you,
Carla Fox
6961 Rushleigh Rd
Englewood, OH 45322

From:	Loretta Matzdorf
To:	Stakeholder Input
Subject:	USPS Rate Increases
Date:	Thursday, July 28, 2022 9:37:12 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Loretta Matzdorf
104 Ash Branch Rd
Pembroke, GA 31321

From:	Roberta Berson
To:	Stakeholder Input
Subject:	Study on USPS Rate Increases
Date:	Thursday, July 28, 2022 9:36:12 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Roberta Berson
641 Venice Ln
Siesta Key, FL 34242

From: Eleanor Woodward
To: Stakeholder Input
Subject: Stop Postage Hikes
Date: Thursday, July 28, 2022 9:30:23 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Eleanor Woodward
4733 N Robb St
Wheat Ridge, CO 80033

From:	nick falica
To:	Stakeholder Input
Subject:	USPS Rate Increases
Date:	Thursday, July 28, 2022 9:29:30 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
nick falica
19629 Swanberg Ln
Mokena, IL 60448

From:	Deborah Shamsuddoha
To:	Stakeholder Input
Subject:	USPS Rate Increases
Date:	Thursday, July 28, 2022 9:28:41 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Deborah Shamsuddoha
6748 Vachon Dr
Bloomfield Hills, MI 48301

From:	Janet Moser
To:	Stakeholder Input
Subject:	Stop Postage Hikes
Date:	Thursday, July 28, 2022 9:21:48 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Janet Moser
596 Campus Pl
Baldwin, NY 11510

From:	Jennifer Griffith
To:	Stakeholder Input
Subject:	USPS Rate Increases
Date:	Thursday, July 28, 2022 9:10:16 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Jennifer Griffith
315 Obie Dr
Durham, NC 27713

From: Chris Casper
To: Stakeholder Input
Subject: Stop Postage Hikes
Date: Thursday, July 28, 2022 9:06:05 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Chris Casper
1600 Sherman Ave
Stevens Point, WI 54481

From:	Allan Fawley
To:	Stakeholder Input
Subject:	USPS Rate Increases
Date:	Thursday, July 28, 2022 9:06:05 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Allan Fawley
W323S8375 Sara St
Mukwonago, WI 53149

From:	nancy baldwin
To:	Stakeholder Input
Subject:	Study on USPS Rate Increases
Date:	Thursday, July 28, 2022 9:06:04 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
nancy baldwin
1612 Rochelle Dr
Dunwoody, GA 30338

From: Linda Scholten
To: Stakeholder Input
Subject: Stop Postage Hikes
Date: Thursday, July 28, 2022 9:00:21 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Linda Scholten
1670 S Lake Dr
Clearwater, FL 33756

From:	Patricia White
To:	Stakeholder Input
Subject:	USPS Rate Increases
Date:	Thursday, July 28, 2022 8:51:43 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Patricia White
7202 Still Hopes Dr
West Columbia, SC 29169

From: Jane Garbacz
To: Stakeholder Input
Subject: Stop Postage Hikes
Date: Thursday, July 28, 2022 8:50:00 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Jane Garbacz
11 South St
Annapolis, MD 21401

From:	Lois Dunn
To:	Stakeholder Input
Subject:	USPS Rate Increases
Date:	Thursday, July 28, 2022 8:42:40 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Lois Dunn
1466 W 1200 N
Layton, UT 84041

From: Pam Crocker
To: Stakeholder Input
Subject: Stop Postage Hikes
Date: Thursday, July 28, 2022 8:27:58 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Pam Crocker
10469 Stokeshill Ct
Pineville, NC 28134

From: Toni Leigh
To: Stakeholder Input
Subject: Stop Postage Hikes
Date: Thursday, July 28, 2022 8:25:50 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Toni Leigh
4032 W 10th St N
Wichita, KS 67212

From: Paula Bowling
To: Stakeholder Input
Subject: Study on USPS Rate Increases
Date: Thursday, July 28, 2022 8:18:42 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Paula Bowling
Albion Rd
Strongsville, OH 44149

From: Paul Maresca
To: Stakeholder Input
Subject: USPS Rate Increases
Date: Thursday, July 28, 2022 8:13:24 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Paul Maresca
12706 Oak Run Ct
Boynton Beach, FL 33436

From: Gustine Augustine
To: Stakeholder Input
Subject: Stop Postage Hikes
Date: Thursday, July 28, 2022 8:12:30 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Gustine Augustine
17 Park Cir
Council Bluffs, IA 51503

From: Christian Schaaf
To: Stakeholder Input
Subject: Study on USPS Rate Increases
Date: Thursday, July 28, 2022 7:54:55 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Christian Schaaf
1305 Shirley Dr
Anderson, SC 29621

From:	Linda Vista
To:	Stakeholder Input
Subject:	Study on USPS Rate Increases
Date:	Thursday, July 28, 2022 7:50:47 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Linda Vista
2562 Airport Rd Apt 4
Portage, WI 53901

From:	Carmen Babcock
To:	Stakeholder Input
Subject:	Stop Postage Hikes
Date:	Thursday, July 28, 2022 7:49:34 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Carmen Babcock
17601 County Rd 196
Flint, TX 75762

From: Phyllis Frisbey
To: Stakeholder Input
Subject: USPS Rate Increases
Date: Thursday, July 28, 2022 7:37:18 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Phyllis Frisbey
1354 Settawig Rd
Brasstown, NC 28902

From: Dorcas Smith
To: Stakeholder Input
Subject: USPS Rate Increases
Date: Thursday, July 28, 2022 7:13:28 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Dorcas Smith
50522 Top of Hill Ct
Plymouth, MI 48170

From:	Martha Johnson
To:	Stakeholder Input
Subject:	USPS Rate Increases
Date:	Thursday, July 28, 2022 7:03:10 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Martha Johnson
973 Wildflower Ct
Virginia Beach, VA 23452

From:	Linda McKillip
To:	Stakeholder Input
Subject:	USPS Rate Increases
Date:	Thursday, July 28, 2022 7:00:11 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Linda McKillip
5 Farmhouse Rd
Gloucester Township, NJ 08081

From:	Lloyd Pritchett
To:	Stakeholder Input
Subject:	USPS Rate Increases
Date:	Thursday, July 28, 2022 6:59:19 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Lloyd Pritchett
437 Withrow Rd
Ellijay, GA 30540

From: Connie Humphrey
To: Stakeholder Input
Subject: Study on USPS Rate Increases
Date: Thursday, July 28, 2022 6:58:20 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Connie Humphrey
66626 Rhinehart Rd
Salesville, OH 43778

From:	Kathy Glish
To:	Stakeholder Input
Subject:	Stop Postage Hikes
Date:	Thursday, July 28, 2022 6:47:29 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Kathy Glish
5821N W Straits Lake Rd
Wetmore, MI 49895

From:	Margaret Stillings
To:	Stakeholder Input
Subject:	Study on USPS Rate Increases
Date:	Thursday, July 28, 2022 6:47:13 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Margaret Stillings
1523 E Rd 2 S
Chino Valley, AZ 86323

From:	Harold Jones
To:	Stakeholder Input
Subject:	Stop Postage Hikes
Date:	Thursday, July 28, 2022 6:43:25 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Harold Jones
220 Arnold Dr
Anderson, SC 29621

From:	Kristen Zebley-Bossert
To:	Stakeholder Input
Subject:	USPS Rate Increases
Date:	Thursday, July 28, 2022 6:40:36 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Kristen Zebley-Bossert
121 Ellison Dr
Milton, DE 19968

From: Kerry Brown
To: Stakeholder Input
Subject: USPS Rate Increases
Date: Thursday, July 28, 2022 6:32:51 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Kerry Brown
4408 S Edgewood Terrace
Fort Worth, TX 76119

From:	Jacquelyne Means
To:	Stakeholder Input
Subject:	USPS Rate Increases
Date:	Thursday, July 28, 2022 6:25:54 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Jacquelyne Means
938 Duluth Hwy
Lawrenceville, GA 30043

From: Sue Hedrick
To: Stakeholder Input
Subject: USPS Rate Increases
Date: Thursday, July 28, 2022 6:23:23 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Sue Hedrick
1220 Lancaster St
Marietta, OH 45750

From:	Maryann Hayes
To:	Stakeholder Input
Subject:	Study on USPS Rate Increases
Date:	Thursday, July 28, 2022 6:21:09 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Maryann Hayes
1427 S Irving Ave
Scranton, PA 18505

From: Carol McGinnis
To: Stakeholder Input
Subject: USPS Rate Increases
Date: Thursday, July 28, 2022 6:05:15 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Carol McGinnis
2808 85th St
Kenosha, WI 53143

From:	Mary Giovannini
To:	Stakeholder Input
Subject:	Stop Postage Hikes
Date:	Thursday, July 28, 2022 6:04:07 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Mary Giovannini
2202 Cedar Ln
Kirksville, MO 63501

From: Woody Kastel
To: Stakeholder Input
Subject: Study on USPS Rate Increases
Date: Thursday, July 28, 2022 6:02:21 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Woody Kastel
27331 262nd Ave
Holcombe, WI 54745

From:	Larry Sturgis
To:	Stakeholder Input
Subject:	USPS Rate Increases
Date:	Thursday, July 28, 2022 6:02:21 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Larry Sturgis
807 E Main St
Cambridge City, IN 47327

From:	Margaret Motley
To:	Stakeholder Input
Subject:	USPS Rate Increases
Date:	Thursday, July 28, 2022 5:54:14 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Margaret Motley
10209 E 95 Terrace
Kansas City, MO 64134

From:	Robin Berman
To:	Stakeholder Input
Subject:	USPS Rate Increases
Date:	Thursday, July 28, 2022 5:45:59 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Robin Berman
507 Strahle St
Philadelphia, PA 19111

From: Karen McHugh
To: Stakeholder Input
Subject: Stop Postage Hikes
Date: Thursday, July 28, 2022 5:41:37 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Karen McHugh
8937 Aberdeen Creek Cir
Riverview, FL 33569

From:	Bob Moore
To:	Stakeholder Input
Subject:	USPS Rate Increases
Date:	Thursday, July 28, 2022 5:39:53 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Bob Moore
25754 Perlman Pl
Stevenson Ranch, CA 91381

From:	Susan Krause
To:	Stakeholder Input
Subject:	USPS Rate Increases
Date:	Thursday, July 28, 2022 5:39:41 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Susan Krause
30318 Hood Rd
Conifer, CO 80433

From:	Elly Alovis
To:	Stakeholder Input
Subject:	Stop Postage Hikes
Date:	Thursday, July 28, 2022 5:36:06 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Elly Alovis
2498 SW 17th Ave
Miami, FL 33145

From:	Jean Hanson
To:	Stakeholder Input
Subject:	Study on USPS Rate Increases
Date:	Thursday, July 28, 2022 5:26:22 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Jean Hanson
38790 Renwood Ave
Avon, OH 44011

From:	Yvonne Fowler
To:	Stakeholder Input
Subject:	Stop Postage Hikes
Date:	Thursday, July 28, 2022 5:25:41 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Yvonne Fowler
2842 Brocktown Rd
Towanda, PA 18848

From:	Judy Taylor
To:	Stakeholder Input
Subject:	Study on USPS Rate Increases
Date:	Thursday, July 28, 2022 5:22:09 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Judy Taylor
161 Weaver Trail
Canon, GA 30520

From:	Jenifer Johnson
To:	Stakeholder Input
Subject:	Stop Postage Hikes
Date:	Thursday, July 28, 2022 5:21:56 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Jenifer Johnson
3336 Woodrun Trail NE
Marietta, GA 30062

From:	Linda Rogers
To:	Stakeholder Input
Subject:	Stop Postage Hikes
Date:	Thursday, July 28, 2022 5:15:11 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Linda Rogers
10805 Silk Tree Ln
Euless, TX 76040

From:	Agnes Swanson
To:	Stakeholder Input
Subject:	Stop Postage Hikes
Date:	Thursday, July 28, 2022 5:13:10 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Agnes Swanson
153 Knox Hwy 34
Rio, IL 61472

From:	Cynthia Shotwell
To:	Stakeholder Input
Subject:	USPS Rate Increases
Date:	Thursday, July 28, 2022 5:09:31 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Cynthia Shotwell
63 E Firestone Blvd
Akron, OH 44301

From: Jennifer Chase
To: Stakeholder Input
Subject: USPS Rate Increases
Date: Thursday, July 28, 2022 4:59:46 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Jennifer Chase
4514 Cardinal Brook Way
Houston, TX 77345

From:	Janet Gustafson
To:	Stakeholder Input
Subject:	Study on USPS Rate Increases
Date:	Thursday, July 28, 2022 4:54:20 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Janet Gustafson
927 1st St Apt 401
Menominee, MI 49858

From:	Andy White
To:	Stakeholder Input
Subject:	USPS Rate Increases
Date:	Thursday, July 28, 2022 4:51:35 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Andy White
PO Box 235
Loyalton, CA 96118

From: Frieda Hughes
To: Stakeholder Input
Subject: USPS Rate Increases
Date: Thursday, July 28, 2022 4:48:54 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Frieda Hughes
3955 Dickson Ave
Cincinnati, OH 45229

From:	Elizabeth Worchesin
To:	Stakeholder Input
Subject:	USPS Rate Increases
Date:	Thursday, July 28, 2022 4:48:41 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Elizabeth Worchesin
191 Buchanan Dr
Sausalito, CA 94965

From:	Jeffrey Hollender
To:	Stakeholder Input
Subject:	USPS Rate Increases
Date:	Thursday, July 28, 2022 4:48:39 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Jeffrey Hollender
226 S Leonard St
Liberty, MO 64068

From: MARY NAYLOR
To: Stakeholder Input
Subject: USPS Rate Increases
Date: Thursday, July 28, 2022 4:46:20 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
MARY NAYLOR
30 Meadow Lks Apt 1
Hightstown, NJ 08520

From: Rosanna Slade
To: Stakeholder Input
Subject: Stop Postage Hikes
Date: Thursday, July 28, 2022 4:42:19 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Rosanna Slade
2372 Debaker Rd
Muskegon, MI 49442

From: Diane Donnellan
To: Stakeholder Input
Subject: USPS Rate Increases
Date: Thursday, July 28, 2022 4:40:23 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Diane Donnellan
598 NW Warrenton Dr
Warrenton, OR 97146

From:	Patrice Humke
To:	Stakeholder Input
Subject:	Study on USPS Rate Increases
Date:	Thursday, July 28, 2022 4:39:40 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Patrice Humke
1260 Caldera Dr
Colorado Springs, CO 80904

From:	Barbara Porter
To:	Stakeholder Input
Subject:	Study on USPS Rate Increases
Date:	Thursday, July 28, 2022 4:38:04 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Barbara Porter
910 J St Lot C22
Salida, CO 81201

From:	Eugene Blum
To:	Stakeholder Input
Subject:	Study on USPS Rate Increases
Date:	Thursday, July 28, 2022 4:36:41 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Eugene Blum
710 Geneva National Ave N
Lake Geneva, WI 53147

From:	Jim Nelson
To:	Stakeholder Input
Subject:	Study on USPS Rate Increases
Date:	Thursday, July 28, 2022 4:36:02 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Jim Nelson
234 N Crown Hill Rd
Orrville, OH 44667

From:	Jacqueline Moses
To:	Stakeholder Input
Subject:	Study on USPS Rate Increases
Date:	Thursday, July 28, 2022 4:30:38 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Jacqueline Moses
3540 Jefferson Rd
Tallahassee, FL 32317

From:	J. F.
To:	Stakeholder Input
Subject:	Stop Postage Hikes
Date:	Thursday, July 28, 2022 4:30:36 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
J. F.
36 Cincinnati Ave
Huron, OH 44839

From: Elizabeth Modlik
To: Stakeholder Input
Subject: USPS Rate Increases
Date: Thursday, July 28, 2022 4:26:38 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Elizabeth Modlik
8055 N Richardt Ave
Indianapolis, IN 46256

From:	Sharon Olson
To:	Stakeholder Input
Subject:	USPS Rate Increases
Date:	Thursday, July 28, 2022 4:25:47 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Sharon Olson
818 Covert Ave
Evansville, IN 47713

From:	Lark Higginbotham
To:	Stakeholder Input
Subject:	USPS Rate Increases
Date:	Thursday, July 28, 2022 4:25:46 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Lark Higginbotham
310 N 1st Ave
Paden City, WV 26159

From: Sindy Smith
To: Stakeholder Input
Subject: USPS Rate Increases
Date: Thursday, July 28, 2022 4:25:22 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Sindy Smith
32200 45th St
Burlington, WI 53105

From:	Guy Theodozio
To:	Stakeholder Input
Subject:	Stop Postage Hikes
Date:	Thursday, July 28, 2022 4:24:02 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Guy Theodozio
410 4th St
Beaver Dam, WI 53916

From:	Sue O"Keefe
To:	Stakeholder Input
Subject:	USPS Rate Increases
Date:	Thursday, July 28, 2022 4:22:46 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Sue O'Keefe
1720 N Prospect Ave
Milwaukee, WI 53202

From: Fern Edison
To: Stakeholder Input
Subject: USPS Rate Increases
Date: Thursday, July 28, 2022 4:14:39 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Fern Edison
560 W Saugerties Rd
Saugerties, NY 12477

From: Joan McGowan
To: Stakeholder Input
Subject: Stop Postage Hikes
Date: Thursday, July 28, 2022 4:10:56 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Joan McGowan
335 Capulet Dr
Venice, FL 34292

From: Pat Burgert
To: Stakeholder Input
Subject: Stop Postage Hikes
Date: Thursday, July 28, 2022 4:05:51 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Pat Burgert
516 Walters Dr
Wake Forest, NC 27587

From:	Michael Rhoden
To:	Stakeholder Input
Subject:	Study on USPS Rate Increases
Date:	Thursday, July 28, 2022 4:02:18 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Michael Rhoden
123 river dr
Middleburg, FL 32068

From: Anderson Sally
To: Stakeholder Input
Subject: Stop Postage Hikes
Date: Thursday, July 28, 2022 3:55:13 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Anderson Sally
16745 Village Dr
Loch Lloyd, MO 64012

From:	Anna Doyle
To:	Stakeholder Input
Subject:	Stop Postage Hikes
Date:	Thursday, July 28, 2022 3:53:48 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Anna Doyle
965 S Jersey St
Denver, CO 80224

From:	Becky Edgar
To:	Stakeholder Input
Subject:	Stop Postage Hikes
Date:	Thursday, July 28, 2022 3:51:24 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Becky Edgar
17784 Lunnonhaus Dr
Golden, CO 80401

From: Leslie Stewart
To: Stakeholder Input
Subject: USPS Rate Increases
Date: Thursday, July 28, 2022 3:48:00 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Leslie Stewart
414 Dark Forest Dr
Chapel Hill, NC 27516

From:	Gloria Capone
To:	Stakeholder Input
Subject:	Study on USPS Rate Increases om
Date:	Thursday, July 28, 2022 3:47:04 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Gloria Capone
712 Elm Dr
Verona, PA 15147

From:	Linda Shockkley-Watson
To:	Stakeholder Input
Subject:	USPS Rate Increases
Date:	Thursday, July 28, 2022 3:46:22 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Linda Shockkley-Watson
302 Allen St
Annapolis, MO 63620

From:	Robb Marks
To:	Stakeholder Input
Subject:	Study on USPS Rate Increases
Date:	Thursday, July 28, 2022 3:41:54 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Robb Marks
6308 W Eden Pl
Milwaukee, WI 53220

From:	Carol Sears
To:	Stakeholder Input
Subject:	Study on USPS Rate Increases
Date:	Thursday, July 28, 2022 3:36:17 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Carol Sears
6625 Burger Dr SE
Grand Rapids, MI 49546

From:	Joan McClelland
To:	Stakeholder Input
Subject:	Study on USPS Rate Increases
Date:	Thursday, July 28, 2022 3:32:28 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Joan McClelland
524 Rover Blvd
White Rock, NM 87544

From:	Rita Urbanski
To:	Stakeholder Input
Subject:	USPS Rate Increases
Date:	Thursday, July 28, 2022 3:30:43 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Rita Urbanski
516 Murano Dr
Kissimmee, FL 34759

From: Ora Owens
To: Stakeholder Input
Subject: Study on USPS Rate Increases
Date: Thursday, July 28, 2022 3:27:27 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Ora Owens
1955 Shiloh Loop
Opelika, AL 36801

From:	Barbara Hofmann
To:	Stakeholder Input
Subject:	Study on USPS Rate Increases
Date:	Thursday, July 28, 2022 3:26:14 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Barbara Hofmann
2944 E Cannon Dr
Phoenix, AZ 85028

From: Craig Lindsay
To: Stakeholder Input
Subject: Stop Postage Hikes
Date: Thursday, July 28, 2022 3:18:34 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Craig Lindsay
12616 Trench Hill Ln
Fredericksburg, VA 22407

From: D Johnson
To: Stakeholder Input
Subject: USPS Rate Increases
Date: Thursday, July 28, 2022 3:16:12 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
D Johnson
211 Watertree Dr
East Syracuse, NY 13057

From:	Robin Paur
To:	Stakeholder Input
Subject:	USPS Rate Increases
Date:	Thursday, July 28, 2022 3:13:02 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Robin Paur
2935 Kristin Ct
PA 18034

From:	John Bruno
To:	Stakeholder Input
Subject:	Stop Postage Hikes
Date:	Thursday, July 28, 2022 3:13:00 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
John Bruno
20369 Woodtrail Rd
Round Hill, VA 20141

From:	Patricia Berry
To:	Stakeholder Input
Subject:	Study on USPS Rate Increases
Date:	Thursday, July 28, 2022 3:12:26 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Patricia Berry
500 S Cobb St
Palmer, AK 99645

From: Ilana Krug
To: Stakeholder Input
Subject: Study on USPS Rate Increases
Date: Thursday, July 28, 2022 3:11:17 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Ilana Krug
6610 Sharon Rd
Baltimore, MD 21239

From: Lila Greathouse
To: Stakeholder Input
Subject: Stop Postage Hikes
Date: Thursday, July 28, 2022 3:10:38 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Lila Greathouse
910 Rockland Rd
Ontonagon, MI 49953

From:	Lauren Schoenleber
To:	Stakeholder Input
Subject:	Study on USPS Rate Increases
Date:	Thursday, July 28, 2022 3:09:13 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Lauren Schoenleber
111 Bickford Dr
Palm Coast, FL 32137

From:	Lindie Nanninga
To:	Stakeholder Input
Subject:	Stop Postage Hikes
Date:	Thursday, July 28, 2022 3:09:12 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Lindie Nanninga
123 4th Ave E
Olympia, WA 98501

From:	Joseph Hillyer
To:	Stakeholder Input
Subject:	Study on USPS Rate Increases
Date:	Thursday, July 28, 2022 3:08:35 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Joseph Hillyer
141 Walnut St
Montclair, NJ 07042

From: Kathy Schiller
To: Stakeholder Input
Subject: Stop Postage Hikes
Date: Thursday, July 28, 2022 3:08:33 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Kathy Schiller
4515 N 107th St
Wauwatosa, WI 53225

From:	Michael Painter
To:	Stakeholder Input
Subject:	USPS Rate Increases
Date:	Thursday, July 28, 2022 3:08:33 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Michael Painter
88 Summer Springs Ln
Paris, VA 20130

From: Kim Scibetta
To: Stakeholder Input
Subject: USPS Rate Increases
Date: Thursday, July 28, 2022 3:06:01 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Kim Scibetta
3326 Lakeview Pkwy
Villa Rica, GA 30180

From: Jennie Weber
To: Stakeholder Input
Subject: USPS Rate Increases
Date: Thursday, July 28, 2022 3:04:43 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Jennie Weber
2093 US-411
Etowah, TN 37331

From:	Lois Paul
To:	Stakeholder Input
Subject:	USPS Rate Increases
Date:	Thursday, July 28, 2022 3:04:13 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Lois Paul
7842 E Bucknell Pl
Denver, CO 80231

From: Kathie Fredericks
To: Stakeholder Input
Subject: Stop Postage Hikes
Date: Thursday, July 28, 2022 3:03:35 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Kathie Fredericks
2419 River Rd
Marysville, MI 48040

From: JAMES BRUEMMER
To: Stakeholder Input
Subject: USPS Rate Increases
Date: Thursday, July 28, 2022 3:03:03 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
JAMES BRUEMMER
415 W Ash St
Saint Joseph, MN 56374

From: Jeff Thatcher
To: Stakeholder Input
Subject: USPS Rate Increases
Date: Thursday, July 28, 2022 3:02:39 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Jeff Thatcher
6173 S Winding Way
Swanton, OH 43558

From:	Diane Hodges
To:	Stakeholder Input
Subject:	Study on USPS Rate Increases
Date:	Thursday, July 28, 2022 2:59:17 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Diane Hodges
10681 W Apishapa Pass
Littleton, CO 80127

From:	Pam McMillin
To:	Stakeholder Input
Subject:	Study on USPS Rate Increases
Date:	Thursday, July 28, 2022 2:58:51 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Pam McMillin
279 Earlywood Way
Louisville, KY 40229

From: Sunny Tabino
To: Stakeholder Input
Subject: USPS Rate Increases
Date: Thursday, July 28, 2022 2:58:20 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Sunny Tabino
70056 Sanderson Rd
Summerville, OR 97876

From:	Linda Elwood
To:	Stakeholder Input
Subject:	NO USPS Rate Increases!
Date:	Thursday, July 28, 2022 2:57:32 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Linda Elwood
30053 N Suscito Dr
Peoria, AZ 85383

From: Susan Hansen
To: Stakeholder Input
Subject: Study on USPS Rate Increases
Date: Thursday, July 28, 2022 2:55:32 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Susan Hansen
82 Brookmeadow North Ln SW
Grandville, MI 49418

From:	Brenda Steiner
To:	Stakeholder Input
Subject:	Study on USPS Rate Increases
Date:	Thursday, July 28, 2022 2:55:13 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Brenda Steiner
3125 Englewood Terrace
Independence, MO 64052

From:	Dorothy Burns
To:	Stakeholder Input
Subject:	Study on USPS Rate Increases
Date:	Thursday, July 28, 2022 2:50:48 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Dorothy Burns
2011 E Crary St
Pasadena, CA 91104

From: Betty Carter
To: Stakeholder Input
Subject: Stop Postage Hikes
Date: Thursday, July 28, 2022 2:50:36 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Betty Carter
12408 Cypress Dr
Gulfport, MS 39503

From:	DEBRA JONES
To:	Stakeholder Input
Subject:	Study on USPS Rate Increases
Date:	Thursday, July 28, 2022 2:49:13 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
DEBRA JONES
10017 Albert Ln
Yukon, OK 73099

From: Arthur Buswell
To: Stakeholder Input
Subject: Study on USPS Rate Increases
Date: Thursday, July 28, 2022 2:48:18 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Arthur Buswell
32 Park cri,
Wardner, ID 83837

From: Rory Robinson
To: Stakeholder Input
Subject: USPS Rate Increases
Date: Thursday, July 28, 2022 2:48:17 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Rory Robinson
26816 Augusta Springs Cir
Leesburg, FL 34748

From:	Linda Lopez
To:	Stakeholder Input
Subject:	Stop Postage Hikes
Date:	Thursday, July 28, 2022 2:46:54 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Linda Lopez
1407 Hickory St
Roseville, CA 95678

From:	Karen Dinning
To:	Stakeholder Input
Subject:	Stop Postage Hikes
Date:	Thursday, July 28, 2022 2:44:32 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Karen Dinning
2352 Milwaukee Rd
Clarks Summit, PA 18411

From: Jo Bennett
To: Stakeholder Input
Subject: Stop Postage Hikes
Date: Thursday, July 28, 2022 2:39:56 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Jo Bennett
401 Creekside Dr
Hurst, TX 76053

From: Melodie Bushaw
To: Stakeholder Input
Subject: Stop Postage Hikes
Date: Thursday, July 28, 2022 2:36:16 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Melodie Bushaw
116 River Ridge Dr
Moore, SC 29369

From: Martha Huffman
To: Stakeholder Input
Subject: Study on USPS Rate Increases
Date: Thursday, July 28, 2022 2:32:41 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Martha Huffman
1446 Huffman Fork Rd
Purlear, NC 28665

From:	Dr Lechnyr
To:	Stakeholder Input
Subject:	Stop Postage Hikes
Date:	Thursday, July 28, 2022 2:32:14 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Dr Lechnyr
1955 McLean Blvd
Eugene, OR 97405

From: Samuel Hinton
To: Stakeholder Input
Subject: Stop Postage Hikes
Date: Thursday, July 28, 2022 2:31:33 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Samuel Hinton
15634 Mission Crest
San Antonio, TX 78232

From: Roxanne Radican
To: Stakeholder Input
Subject: Stop Postage Hikes
Date: Thursday, July 28, 2022 2:31:17 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Roxanne Radican
2122 Avenue A
Grand Prairie, TX 75051

From:	Michael Hegemeyer
To:	Stakeholder Input
Subject:	Stop Postage Hikes
Date:	Thursday, July 28, 2022 2:29:07 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Michael Hegemeyer
1660 W Klamath Dr
Tucson, AZ 85704

From: Stephanie Fairchild
To: Stakeholder Input
Subject: USPS Rate Increases
Date: Thursday, July 28, 2022 2:24:45 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Stephanie Fairchild
1211 Foster Ave
Cambridge, OH 43725

From: Ron Boose
To: Stakeholder Input
Subject: Stop Postage Hikes
Date: Thursday, July 28, 2022 2:20:16 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Ron Boose
920 Ash Land Ct
Lewisville, NC 27023

From:	IVA BURKETT
To:	Stakeholder Input
Subject:	Stop Postage Hikes
Date:	Thursday, July 28, 2022 2:19:25 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
IVA BURKETT
899 W Rd
Atmore, AL 36502

From: Charlie Cox
To: Stakeholder Input
Subject: Study on USPS Rate Increases
Date: Thursday, July 28, 2022 2:07:03 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Charlie Cox
2826 Dupont St S
Gulfport, FL 33707

From:	Leah Nadel
To:	Stakeholder Input
Subject:	USPS Rate Increases
Date:	Thursday, July 28, 2022 2:06:07 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Leah Nadel
13460 SW 63rd Pl
Portland, OR 97219

From:	Rosalie DellaRatta
To:	Stakeholder Input
Subject:	Study on USPS Rate Increases
Date:	Thursday, July 28, 2022 2:04:53 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Rosalie DellaRatta
1690 Chagrin River Rd
Gates Mills, OH 44040

From: Helen Taylor
To: Stakeholder Input
Subject: Stop Postage Hikes
Date: Thursday, July 28, 2022 2:03:46 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Helen Taylor
PO Box 1947
Alamosa, CO 81101

From: Cindy Wagner
To: Stakeholder Input
Subject: Stop Postage Hikes
Date: Thursday, July 28, 2022 2:03:31 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Cindy Wagner
603 Willow Ct Cir
Brandon, MS 39047

From: Janet Black
To: Stakeholder Input
Subject: Study on USPS Rate Increases
Date: Thursday, July 28, 2022 2:02:30 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Janet Black
12 Warren Creek Rd
Candler, NC 28715

From: Kathy Guest
To: Stakeholder Input
Subject: Study on USPS Rate Increases
Date: Thursday, July 28, 2022 2:01:00 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Kathy Guest
24301 Brown Rd
South Bloomingville, OH 43152

From:	John Deuel
To:	Stakeholder Input
Subject:	USPS Rate Increases
Date:	Thursday, July 28, 2022 1:59:53 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
John Deuel
134 Tearose Ln
Murphy, NC 28906

From: Judith Ivey
To: Stakeholder Input
Subject: Stop Postage Hikes
Date: Thursday, July 28, 2022 1:54:53 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Judith Ivey
36 Lincoln Ave
Berea, OH 44017

From: Carolyn Rundell
To: Stakeholder Input
Subject: USPS Rate Increases
Date: Thursday, July 28, 2022 1:54:35 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Carolyn Rundell
7504 24th Ave NW
Seattle, WA 98117

From: Susan Tedesco
To: Stakeholder Input
Subject: USPS Rate Increases
Date: Thursday, July 28, 2022 1:53:46 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Susan Tedesco
5836 N Sacramento Ave
Chicago, IL 60659

From: Reedy Morris
To: Stakeholder Input
Subject: Stop Postage Hikes
Date: Thursday, July 28, 2022 1:52:38 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Reedy Morris
822 Cambridge Shores Dr
Gilbertsville, KY 42044

From: John Swensen
To: Stakeholder Input
Subject: Stop Postage Hikes
Date: Thursday, July 28, 2022 1:52:31 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
John Swensen
106 Upper North Highland Pl
Croton-on-hudson, NY 10520

From:	JoAnn Sorrell
To:	Stakeholder Input
Subject:	Stop Postage Hikes
Date:	Thursday, July 28, 2022 1:51:46 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
JoAnn Sorrell
95 W 5th Ave
Collegeville, PA 19426

From:	Erik Lund
To:	Stakeholder Input
Subject:	USPS Rate Increases
Date:	Thursday, July 28, 2022 1:51:28 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Erik Lund
8413 Juniper St
Prairie Village, KS 66207

From: Linda Jakobi
To: Stakeholder Input
Subject: Stop Postage Hikes
Date: Thursday, July 28, 2022 1:51:10 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Linda Jakobi
2854 S Poplar Ave
Chicago, IL 60608

From:	Randy Randolph
To:	Stakeholder Input
Subject:	Study on USPS Rate Increases
Date:	Thursday, July 28, 2022 1:49:14 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Randy Randolph
17249 N 7th St
Phoenix, AZ 85022

From:	Elizabeth Snow
To:	Stakeholder Input
Subject:	USPS Rate Increases
Date:	Thursday, July 28, 2022 1:42:44 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Elizabeth Snow
PO Box 214
Kelliher, MN 56650

From:	Martha Tack
To:	Stakeholder Input
Subject:	USPS Rate Increases
Date:	Thursday, July 28, 2022 1:41:41 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Martha Tack
2757 Pleasant Hill Rd
Wetumpka, AL 36092

From:	Raymond Nowakowski
To:	Stakeholder Input
Subject:	Study on USPS Rate Increases
Date:	Thursday, July 28, 2022 1:41:09 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Raymond Nowakowski
6813 S 40th Dr
Phoenix, AZ 85041

From: Layna Bentley
To: Stakeholder Input
Subject: Stop Postage Hikes
Date: Thursday, July 28, 2022 1:40:06 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Layna Bentley
2521 N 78th St
Omaha, NE 68134

From: Barbara Collins
To: Stakeholder Input
Subject: Study on USPS Rate Increases
Date: Thursday, July 28, 2022 1:38:59 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Barbara Collins
8800 NE 82nd St
Kansas City, MO 64158

From:	Sally Roberts
To:	Stakeholder Input
Subject:	Stop Postage Hikes
Date:	Thursday, July 28, 2022 1:38:45 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Sally Roberts
200 Timberline Dr
Marietta, OH 45750

From: Margery Dickerson
To: Stakeholder Input
Subject: Study on USPS Rate Increases
Date: Thursday, July 28, 2022 1:37:23 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Margery Dickerson
1030 Raiders Rd
Dresden, OH 43821

From: Jeffrey Hollender
To: Stakeholder Input
Subject: Stop Postage Hikes
Date: Thursday, July 28, 2022 1:37:21 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Jeffrey Hollender
226 S Leonard St
Liberty, MO 64068

From:	Allan Meinhaldt
To:	Stakeholder Input
Subject:	USPS Rate Increases
Date:	Thursday, July 28, 2022 1:36:29 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Allan Meinhaldt
2102 Ferguson Dr
Wilmington, DE 19808

From:	Tammi Priggins
To:	Stakeholder Input
Subject:	Stop Postage Hikes
Date:	Thursday, July 28, 2022 1:35:54 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Tammi Priggins
330 E 308th St
Willowick, OH 44095

From:	Sandra Swafford-Uhl
To:	Stakeholder Input
Subject:	USPS Rate Increases
Date:	Thursday, July 28, 2022 1:35:18 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Sandra Swafford-Uhl
7685 Fitch Rd
OH 44138

From: Verna Hardwick
To: Stakeholder Input
Subject: Stop Postage Hikes
Date: Thursday, July 28, 2022 1:34:55 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Verna Hardwick
2714 S Nob Hill Dr
Florence, SC 29505

From: Susan Morgan
To: Stakeholder Input
Subject: Study on USPS Rate Increases
Date: Thursday, July 28, 2022 1:34:54 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Susan Morgan
10611 N Forker Rd
Spokane, WA 99217

From:	Linda Hall
To:	Stakeholder Input
Subject:	USPS Rate Increases
Date:	Thursday, July 28, 2022 1:34:43 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Linda Hall
10977 Dobbins Run
Lafayette, CO 80026

From: Mary Seegott
To: Stakeholder Input
Subject: Study on USPS Rate Increases
Date: Thursday, July 28, 2022 1:34:17 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Mary Seegott
15281 Main Market Rd
Burton, OH 44021

From: Cindy Watts
To: Stakeholder Input
Subject: USPS Rate Increases
Date: Thursday, July 28, 2022 1:32:30 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Cindy Watts
5035 Wooten Rd
Athens, OH 45701

From:	Joan Harper
To:	Stakeholder Input
Subject:	Stop Postage Hikes
Date:	Thursday, July 28, 2022 1:31:43 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Joan Harper
30 Violet Dr
Honey Brook, PA 19344

From:	Janet Lazarus
To:	Stakeholder Input
Subject:	USPS Rate Increases
Date:	Thursday, July 28, 2022 1:29:43 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Janet Lazarus
2466 Greensprings Ct
Cincinnati, OH 45231

From:	Laura Staples
To:	Stakeholder Input
Subject:	Study on USPS Rate Increases
Date:	Thursday, July 28, 2022 1:26:25 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Laura Staples
5792 Whistlewood Cir
Sarasota, FL 34232

From:	Jim Waymire
To:	Stakeholder Input
Subject:	Study on USPS Rate Increases
Date:	Thursday, July 28, 2022 1:25:45 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Jim Waymire
3521 SE 18th Pl
Cape Coral, FL 33904

From:	Frank Wheeler
To:	Stakeholder Input
Subject:	Stop Postage Hikes
Date:	Thursday, July 28, 2022 1:25:44 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Frank Wheeler
2952 Pleasant Grove Rd
Lansing, MI 48910

From:	Alice Sutton
To:	Stakeholder Input
Subject:	Stop Postage Hikes
Date:	Thursday, July 28, 2022 1:24:22 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Alice Sutton
2603 Barrington Dr N
Wilson, NC 27896

From:	Phil Strickland
To:	Stakeholder Input
Subject:	Study on USPS Rate Increases
Date:	Thursday, July 28, 2022 1:23:55 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Phil Strickland
261 Schrop Ave
Akron, OH 44312

From: Virginia Biddulph
To: Stakeholder Input
Subject: Study on USPS Rate Increases
Date: Thursday, July 28, 2022 1:22:32 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Virginia Biddulph
11102 SW Sunrise Lk Ter
Port St. Lucie, FL 34987

From: Coral Moore
To: Stakeholder Input
Subject: USPS Rate Increases
Date: Thursday, July 28, 2022 1:18:38 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Coral Moore
3722 Mission Way
Lake Havasu City, AZ 86406

From:	Betty Davis
To:	Stakeholder Input
Subject:	Study on USPS Rate Increases
Date:	Thursday, July 28, 2022 1:18:38 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Betty Davis
373 Grays Ln
Elizabethtown, NC 28337

From:	Sandy Whitney
To:	Stakeholder Input
Subject:	USPS Rate Increases
Date:	Thursday, July 28, 2022 1:17:26 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Sandy Whitney
5806 Clubhouse Dr
New Port Richey, FL 34653

From: Jane Strom
To: Stakeholder Input
Subject: Stop Postage Hikes
Date: Thursday, July 28, 2022 1:15:55 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Jane Strom
925 S Chapin Rd
Merrill, MI 48637

From:	Scott Hansen
To:	Stakeholder Input
Subject:	Stop Postage Hikes
Date:	Thursday, July 28, 2022 1:15:36 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Scott Hansen
441 Dundee Ave
Elgin, IL 60120

From:	Gayle Bradley
To:	Stakeholder Input
Subject:	Study on USPS Rate Increases
Date:	Thursday, July 28, 2022 1:15:35 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Gayle Bradley
1822 S 190th Plaza
Omaha, NE 68130

From:	Robert Bates
To:	Stakeholder Input
Subject:	Study on USPS Rate Increases
Date:	Thursday, July 28, 2022 1:15:23 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Robert Bates
3764 Dornoch Dr
Wooster, OH 44691

From: Christopher Mahoney
To: Stakeholder Input
Subject: Stop Postage Hikes
Date: Thursday, July 28, 2022 1:14:39 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Christopher Mahoney
4425 Brooklands Dr
Hilliard, OH 43026

From:	Laura Klass
To:	Stakeholder Input
Subject:	Study on USPS Rate Increases
Date:	Thursday, July 28, 2022 1:13:45 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Laura Klass
3301 W Calle Cereza
Tucson, AZ 85741

From: TERRENCE BURKE
To: Stakeholder Input
Subject: Stop Postage Hikes
Date: Thursday, July 28, 2022 1:12:59 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
TERRENCE BURKE
102 Minuet Terrace
Clarks Summit, PA 18411

From:	Roman Fruth
To:	Stakeholder Input
Subject:	Stop Postage Hikes
Date:	Thursday, July 28, 2022 1:12:29 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Roman Fruth
5143 Grovehill St
San Antonio, TX 78228

From: Deborah Harvey
To: Stakeholder Input
Subject: Stop Postage Hikes
Date: Thursday, July 28, 2022 1:11:37 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Deborah Harvey
268 Archers Glen Cir
Bellefonte, PA 16823

From:	Vincent Puma
To:	Stakeholder Input
Subject:	Stop Postage Hikes
Date:	Thursday, July 28, 2022 1:11:35 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Vincent Puma
117 Cherry Dr W
Plainview, NY 11803

From: Pat Emmert
To: Stakeholder Input
Subject: USPS Rate Increases
Date: Thursday, July 28, 2022 1:11:34 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Pat Emmert
5200 Summer Dr
Austin, TX 78741

From: Anne M.Hill
To: Stakeholder Input
Subject: Study on USPS Rate Increases
Date: Thursday, July 28, 2022 1:11:17 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Anne M.Hill
3 Sycamore Cir
Albrightsville, PA 18210

From:	JOSEPH FOTI
To:	Stakeholder Input
Subject:	USPS Rate Increases
Date:	Thursday, July 28, 2022 1:08:56 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
JOSEPH FOTI
200 N 61st St
Harrisburg, PA 17111

From: Kevin Cheney
To: Stakeholder Input
Subject: Study on USPS Rate Increases
Date: Thursday, July 28, 2022 1:07:51 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Kevin Cheney
10948 Colonel Winn Loop
Austin, TX 78748

From: Peggy Bryson
To: Stakeholder Input
Subject: USPS Rate Increases
Date: Thursday, July 28, 2022 1:07:33 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Peggy Bryson
4722 Camp Creek Rd
Lancaster, SC 29720

From:	Harold Mosher
To:	Stakeholder Input
Subject:	Stop Postage Hikes
Date:	Thursday, July 28, 2022 1:06:57 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Harold Mosher
2021 Nightingale Ave
Mcallen, TX 78504

From: Shellie Rubin
To: Stakeholder Input
Subject: Stop Postage Hikes
Date: Thursday, July 28, 2022 1:06:33 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Shellie Rubin
1456 Brenner Park Dr
Venice, FL 34292

From:	Marsha Lackey
To:	Stakeholder Input
Subject:	Study on USPS Rate Increases
Date:	Thursday, July 28, 2022 1:06:33 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Marsha Lackey
2183 Shawn Dr
Middletown, VA 22645

From: Robert Walker
To: Stakeholder Input
Subject: USPS Rate Increases
Date: Thursday, July 28, 2022 1:06:17 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Robert Walker
862 Franks Rd
Susquehanna, PA 18847

From:	Richard Klein
To:	Stakeholder Input
Subject:	USPS Rate Increases
Date:	Thursday, July 28, 2022 1:06:16 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Richard Klein
515 Upland Creek
San Antonio, TX 78245

From:	Lisa Del Puerto
To:	Stakeholder Input
Subject:	Study on USPS Rate Increases
Date:	Thursday, July 28, 2022 1:05:41 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Lisa Del Puerto
1641 Westmoor Rd
Burlingame, CA 94010

From: Joseph Williams
To: Stakeholder Input
Subject: Stop Postage Hikes
Date: Thursday, July 28, 2022 1:05:06 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Joseph Williams
1717 Doulton Ave
Huntington, WV 25701

From: Scott Murray
To: Stakeholder Input
Subject: USPS Rate Increases
Date: Thursday, July 28, 2022 1:05:06 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Scott Murray
3513 Yucca Dr
Flower Mound, TX 75028

From:	Ronda O"Brien
To:	Stakeholder Input
Subject:	Study on USPS Rate Increases
Date:	Thursday, July 28, 2022 1:04:40 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Ronda O'Brien
701 Parsons Dr
Yukon, OK 73099

From: Theresa Aguiar
To: Stakeholder Input
Subject: Study on USPS Rate Increases
Date: Thursday, July 28, 2022 1:04:08 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Theresa Aguiar
1231 Bonnie View Rd
Hollister, CA 95023

From:	Velma Gardea
To:	Stakeholder Input
Subject:	Stop Postage Hikes
Date:	Thursday, July 28, 2022 1:03:56 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Velma Gardea
6535 N 24th Dr
Phoenix, AZ 85015

From:	Nyla Taylor
To:	Stakeholder Input
Subject:	Study on USPS Rate Increases
Date:	Thursday, July 28, 2022 1:03:54 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Nyla Taylor
12225 13th Dr SE
Everett, WA 98208

From:	Jeff Latta
To:	Stakeholder Input
Subject:	Study on USPS Rate Increases
Date:	Thursday, July 28, 2022 1:03:54 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Jeff Latta
25 Summit Ave
Hagerstown, MD 21740

From:	Susanne Roy
To:	Stakeholder Input
Subject:	Study on USPS Rate Increases
Date:	Thursday, July 28, 2022 1:03:30 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Susanne Roy
1114 Shawnee Trail
Carrollton, TX 75007

From: Michael Lehning
To: Stakeholder Input
Subject: Stop Postage Hikes
Date: Thursday, July 28, 2022 1:03:30 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Michael Lehning
1301 Wilson Ave
Carpentersville, IL 60110

From: Donna Otero
To: Stakeholder Input
Subject: USPS Rate Increases
Date: Thursday, July 28, 2022 1:02:43 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Donna Otero
145 Oakwood Ave
Trenton, GA 30752

From: DeAnna Blair
To: Stakeholder Input
Subject: Study on USPS Rate Increases
Date: Thursday, July 28, 2022 1:02:29 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
DeAnna Blair
4835 Halsey St
Shawnee, KS 66216

From:	Karen Naprstek
To:	Stakeholder Input
Subject:	USPS Rate Increases
Date:	Thursday, July 28, 2022 1:01:12 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Karen Naprstek
1601 Park Ave
Omaha, NE 68105

From:	helen kronk
To:	Stakeholder Input
Subject:	Study on USPS Rate Increases
Date:	Thursday, July 28, 2022 1:00:56 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
helen kronk
17 Twin Cir Ct
Yardley, PA 19067

From: Mary Strates
To: Stakeholder Input
Subject: Study on USPS Rate Increases
Date: Thursday, July 28, 2022 1:00:25 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Mary Strates
867 Leeward Dr
Deltona, FL 32738

From:	Marilyn Koehler
To:	Stakeholder Input
Subject:	Stop Postage Hikes
Date:	Thursday, July 28, 2022 1:00:01 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Marilyn Koehler
Burnt Sienna Dr
Mount Washington, KY 40047

From: Katherine Kubacki
To: Stakeholder Input
Subject: USPS Rate Increases
Date: Thursday, July 28, 2022 12:59:36 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Katherine Kubacki
110 Aurora St
Antigo, WI 54409

From:	Bud Ramkey
To:	Stakeholder Input
Subject:	USPS Rate Increases
Date:	Thursday, July 28, 2022 12:58:58 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Bud Ramkey
3705 Shadyside Ave
Ashtabula, OH 44004

From:	Nicole Vernier
To:	Stakeholder Input
Subject:	Study on USPS Rate Increases
Date:	Thursday, July 28, 2022 12:58:15 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Nicole Vernier
7130 Medicine Bow Ave
Fountain, CO 80817

From: Russell Tackett
To: Stakeholder Input
Subject: Stop Postage Hikes
Date: Thursday, July 28, 2022 12:57:41 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Russell Tackett
24 Tackett Rd
Lloyd, KY 41144

From:	leora broche
To:	Stakeholder Input
Subject:	USPS Rate Increases
Date:	Thursday, July 28, 2022 12:56:41 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
leora broche
120 Apple Tree Row
Berkeley Heights, NJ 07922

From: Patricia Aduddle
To: Stakeholder Input
Subject: Study on USPS Rate Increases
Date: Thursday, July 28, 2022 12:56:40 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Patricia Aduddle
18081 Placita Del Silbido
Sahuarita, AZ 85629

From: Jeanne Cella
To: Stakeholder Input
Subject: Stop Postage Hikes
Date: Thursday, July 28, 2022 12:56:21 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Jeanne Cella
6426 Runnel Dr
New Port Richey, FL 34653

From:	Bob Robinson
To:	Stakeholder Input
Subject:	Stop Postage Hikes
Date:	Thursday, July 28, 2022 12:56:21 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Bob Robinson
5820 Carmel Rd
Charlotte, NC 28226

From:	Stephanie Shine
To:	Stakeholder Input
Subject:	USPS Rate Increases
Date:	Thursday, July 28, 2022 12:55:51 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Stephanie Shine
104 Music Rd
Ponderosa, NM 87044

From: Karen Level
To: Stakeholder Input
Subject: Stop Postage Hikes
Date: Thursday, July 28, 2022 12:55:48 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Karen Level
9107 Bristol Ave
Louisville, KY 40220

From:	Gary Kust
To:	Stakeholder Input
Subject:	Stop Postage Hikes
Date:	Thursday, July 28, 2022 12:55:16 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Gary Kust
1905 S Moorland Rd
New Berlin, WI 53151

From: Martin Sandin
To: Stakeholder Input
Subject: Study on USPS Rate Increases
Date: Thursday, July 28, 2022 12:55:03 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Martin Sandin
7200 Van Dorn St
Lincoln, NE 68506

From: M Sambuchino
To: Stakeholder Input
Subject: Stop Postage Hikes
Date: Thursday, July 28, 2022 12:54:50 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
M Sambuchino
913 State St
Erie, PA 16501

From:	catherine Garneski
To:	Stakeholder Input
Subject:	Study on USPS Rate Increases
Date:	Thursday, July 28, 2022 12:54:31 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
catherine Garneski
261 Salt Creek Dr
Dover, DE 19901

From:	Greg Gibson
To:	Stakeholder Input
Subject:	USPS Rate Increases
Date:	Thursday, July 28, 2022 12:54:25 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Greg Gibson
6635 Green Shadows Ln
Memphis, TN 38119

From: Laura Todd
To: Stakeholder Input
Subject: Study on USPS Rate Increases
Date: Thursday, July 28, 2022 12:53:48 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Laura Todd
5904 91st St
Lubbock, TX 79424

From: Peter Klee
To: Stakeholder Input
Subject: Stop Postage Hikes
Date: Thursday, July 28, 2022 12:53:48 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Peter Klee
1322 Arch St
Norristown, PA 19401

From:	Craig Lorenzen
To:	Stakeholder Input
Subject:	Stop Postage Hikes
Date:	Thursday, July 28, 2022 12:53:47 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Craig Lorenzen
11640 113th St
Overland Park, KS 66210

From:	Margie Carroll
To:	Stakeholder Input
Subject:	USPS Rate Increases
Date:	Thursday, July 28, 2022 12:53:34 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Margie Carroll
1534 S Clay St
Denver, CO 80219

From: Randy Mendelsohn
To: Stakeholder Input
Subject: Stop Postage Hikes
Date: Thursday, July 28, 2022 12:53:22 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Randy Mendelsohn
20 Ocean Ct
Brooklyn, NY 11223

From: Daniel Marlin
To: Stakeholder Input
Subject: Stop Postage Hikes
Date: Thursday, July 28, 2022 12:52:23 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Daniel Marlin
108 Fir St
Ten Sleep, WY 82442

From:	Carolyn StPe"
To:	Stakeholder Input
Subject:	Study on USPS Rate Increases
Date:	Thursday, July 28, 2022 12:52:19 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Carolyn StPe'
14703 Eagle Vista Dr
Houston, TX 77077

From: Bennie Woodard
To: Stakeholder Input
Subject: USPS Rate Increases
Date: Thursday, July 28, 2022 12:51:58 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Bennie Woodard
208 Lake Howard Dr SW
Winter Haven, FL 33880

From: Edmund Allatt
To: Stakeholder Input
Subject: Stop Postage Hikes
Date: Thursday, July 28, 2022 12:51:03 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Edmund Allatt
13052 Beckwith Rd
Sonora, CA 95370

From: Josue Herbert
To: Stakeholder Input
Subject: USPS Rate Increases
Date: Thursday, July 28, 2022 12:49:15 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Josue Herbert
329 N 44th St
Louisville, KY 40212

From: Joyce Saunders
To: Stakeholder Input
Subject: Stop Postage Hikes
Date: Thursday, July 28, 2022 12:48:16 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Joyce Saunders
1841 Waughtown St
Winston-salem, NC 27107

From:	Juan Garibay
To:	Stakeholder Input
Subject:	USPS Rate Increases
Date:	Thursday, July 28, 2022 12:47:57 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Juan Garibay
351 Lafayette Dr
El Paso, TX 79915

From:	kathy Thomas
To:	Stakeholder Input
Subject:	Study on USPS Rate Increases
Date:	Thursday, July 28, 2022 12:47:55 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
kathy Thomas
6209 Saddleback Dr
Oklahoma City, OK 73150

From:	Connie Smith
To:	Stakeholder Input
Subject:	Study on USPS Rate Increases
Date:	Thursday, July 28, 2022 12:47:54 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Connie Smith
2521 Coulee St
Irving, TX 75062

From:	Marge Veach
To:	Stakeholder Input
Subject:	Stop Postage Hikes
Date:	Thursday, July 28, 2022 12:47:27 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Marge Veach
4 Canela Ct
Homosassa, FL 34446

From: Eileen Juric
To: Stakeholder Input
Subject: Study on USPS Rate Increases
Date: Thursday, July 28, 2022 12:46:40 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Eileen Juric
511 Adams St
Raleigh, NC 27605

From: Jack Sopher
To: Stakeholder Input
Subject: Stop Postage Hikes
Date: Thursday, July 28, 2022 12:46:40 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Jack Sopher
773 Nettles Blvd
Jensen Beach, FL 34957

From: Kenneth Barber
To: Stakeholder Input
Subject: USPS Rate Increases
Date: Thursday, July 28, 2022 12:46:38 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Kenneth Barber
355 S Salem St
Aurora, CO 80012

From:	Alan Stageberg
To:	Stakeholder Input
Subject:	USPS Rate Increases
Date:	Thursday, July 28, 2022 12:46:35 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Alan Stageberg
628 Radford Square
Billings, MT 59105

From: Donna Arnold
To: Stakeholder Input
Subject: Study on USPS Rate Increases
Date: Thursday, July 28, 2022 12:45:29 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Donna Arnold
2529 Avenham Ave SW
Roanoke, VA 24014

From:	Marcia Nugent
To:	Stakeholder Input
Subject:	Stop Postage Hikes
Date:	Thursday, July 28, 2022 12:44:40 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Marcia Nugent
7618 Crestone Peak Trail
Colorado Springs, CO 80924

From: Louise Kulp
To: Stakeholder Input
Subject: Stop Postage Hikes
Date: Thursday, July 28, 2022 12:43:41 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Louise Kulp
16 Ruskin Rd
Elizabethtown, NC 28337

From: Steven Templin
To: Stakeholder Input
Subject: Study on USPS Rate Increases
Date: Thursday, July 28, 2022 12:43:14 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Steven Templin
1909 North Bloody Gulch Road
Tombstone, AZ 85638

From:	Carol Mais
To:	Stakeholder Input
Subject:	Study on USPS Rate Increases
Date:	Thursday, July 28, 2022 12:42:28 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Carol Mais
1154 NE Mulberry St
Lee's Summit, MO 64086

From: Acisclo Lopez
To: Stakeholder Input
Subject: Study on USPS Rate Increases
Date: Thursday, July 28, 2022 12:41:48 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Acisclo Lopez
1295 N Ash St
Gilbert, AZ 85233

From:	Barbara Benigno
To:	Stakeholder Input
Subject:	USPS Rate Increases
Date:	Thursday, July 28, 2022 12:41:36 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Barbara Benigno
916 Magnolia St
Lake Jackson, TX 77566

From:	Cheryl Mahon
To:	Stakeholder Input
Subject:	Study on USPS Rate Increases
Date:	Thursday, July 28, 2022 12:40:22 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Cheryl Mahon
417 Church St
Chillicothe, OH 45601

From:	Judy Ballinger
To:	Stakeholder Input
Subject:	USPS Rate Increases
Date:	Thursday, July 28, 2022 12:36:48 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Judy Ballinger
2649 Francisco Way
El Cerrito, CA 94530

From: Donna Belardi
To: Stakeholder Input
Subject: Stop Postage Hikes
Date: Tuesday, July 26, 2022 7:13:54 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Donna Belardi
39 Broadway
New York, NY 10006

From:	Elizabeth Hornback
To:	Stakeholder Input
Subject:	Study on USPS Rate Increases
Date:	Tuesday, July 26, 2022 11:23:11 AM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Elizabeth Hornback
2891 Rock Chimney Cir
Lancaster, SC 29720

From: Regina Rosenthal
To: Stakeholder Input
Subject: Study on USPS Rate Increases
Date: Tuesday, July 26, 2022 11:22:09 AM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Regina Rosenthal
303 Hampton Green
Staten Island, NY 10312

From:	George White
To:	Stakeholder Input
Subject:	Study on USPS Rate Increases
Date:	Tuesday, July 26, 2022 11:21:11 AM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
George White
6049 Hi Tek Ct
Mason, OH 45040

From:	Amy Murphy
To:	Stakeholder Input
Subject:	Study on USPS Rate Increases
Date:	Tuesday, July 26, 2022 11:20:08 AM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Amy Murphy
225 Haddon Ave
Haddon Township, NJ 08108

From: Martin Milisits
To: Stakeholder Input
Subject: Study on USPS Rate Increases
Date: Tuesday, July 26, 2022 11:19:12 AM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Martin Milisits
1646 1st Ave.
New York, NY 10028

From: KATE MURRAY
To: Stakeholder Input
Subject: Study on USPS Rate Increases
Date: Tuesday, July 26, 2022 11:18:24 AM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
KATE MURRAY
110 Ulster Ave
Saugerties, NY 12477

From:	Kendra Silvestri
To:	Stakeholder Input
Subject:	Study on USPS Rate Increases
Date:	Tuesday, July 26, 2022 11:17:08 AM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Kendra Silvestri
109 Nelson St
Leominster, MA 01453

From:	Mary Hawkins
To:	Stakeholder Input
Subject:	Study on USPS Rate Increases
Date:	Tuesday, July 26, 2022 11:16:21 AM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Mary Hawkins
33-39 80th St
Queens, NY 11372

From:	Nicky Burton
To:	Stakeholder Input
Subject:	Study on USPS Rate Increases
Date:	Tuesday, July 26, 2022 11:15:18 AM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Nicky Burton
74 Ayrault St
Newport, RI 02840

From:	Dana Lynch
To:	Stakeholder Input
Subject:	Study on USPS Rate Increases
Date:	Tuesday, July 26, 2022 11:14:17 AM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Dana Lynch
15 Dudley Rd
Wellesley, MA 02481

From:	Ian Pribyl
To:	Stakeholder Input
Subject:	Study on USPS Rate Increases
Date:	Tuesday, July 26, 2022 11:13:15 AM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Ian Pribyl
8205 Silhouette St
Austin, TX 78744

From:	Susan January
To:	Stakeholder Input
Subject:	Study on USPS Rate Increases
Date:	Tuesday, July 26, 2022 11:12:29 AM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Susan January
1038 Mircos St
Erie, CO 80516

From:	Donna Lund
To:	Stakeholder Input
Subject:	Study on USPS Rate Increases
Date:	Tuesday, July 26, 2022 11:11:08 AM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Donna Lund
2723 Moores Valley Dr
Baltimore, MD 21209

From:	Tyson Patterson
To:	Stakeholder Input
Subject:	Study on USPS Rate Increases
Date:	Tuesday, July 26, 2022 11:10:14 AM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Tyson Patterson
11830 NW Thompson Rd
Portland, OR 97229

From:	Victoria Venturi
To:	Stakeholder Input
Subject:	USPS Rate Increases
Date:	Tuesday, July 26, 2022 11:09:09 AM

Dear Secretary Barker:

As the owner of a stationery store my customers are already complaining about the cost of stamps. Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Victoria Venturi
2501 SE Clinton St
Portland, OR 97202

From: Ellen Gillespie
To: Stakeholder Input
Subject: Stop Postage Hikes
Date: Tuesday, July 26, 2022 11:08:18 AM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Ellen Gillespie
3317 Afton Pl
Birmingham, AL 35242

From: Katie Simpkins
To: Stakeholder Input
Subject: Stop Postage Hikes
Date: Tuesday, July 26, 2022 11:07:17 AM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Katie Simpkins
674 W National Rd
Vandalia, OH 45377

From: Ryan Kissick
To: Stakeholder Input
Subject: Stop Postage Hikes
Date: Tuesday, July 26, 2022 11:06:10 AM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Ryan Kissick
2744 E 11th St
Oakland, CA 94601

From:	Xhensila Velencia
To:	Stakeholder Input
Subject:	Stop Postage Hikes
Date:	Tuesday, July 26, 2022 11:05:43 AM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Xhensila Velencia
1107 S Walter Reed Dr
Arlington, VA 22204

From:	Danae McLaughlin
To:	Stakeholder Input
Subject:	Stop Postage Hikes
Date:	Tuesday, July 26, 2022 11:05:21 AM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Danae McLaughlin
4021 Beach Dr SW
Seattle, WA 98116

From:	RAPHAEL WOLF
To:	Stakeholder Input
Subject:	Stop Postage Hikes
Date:	Tuesday, July 26, 2022 11:03:19 AM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
RAPHAEL WOLF
47 Mellen St
Framingham, MA 01702

From: David Wilke
To: Stakeholder Input
Subject: Stop Postage Hikes
Date: Tuesday, July 26, 2022 11:02:17 AM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
David Wilke
4605 W Hunting Park Dr
Franklin, WI 53132

From: Gail Anderson
To: Stakeholder Input
Subject: Stop Postage Hikes
Date: Tuesday, July 26, 2022 11:01:16 AM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Gail Anderson
2293 S Thompson Dr
Madison, WI 53716

From: Sarah Schwartz
To: Stakeholder Input
Subject: Stop Postage Hikes
Date: Tuesday, July 26, 2022 11:00:17 AM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Sarah Schwartz
25001 Wimbledon Rd
Beachwood, OH 44122

From: Amy McAnarney
To: Stakeholder Input
Subject: Stop Postage Hikes
Date: Tuesday, July 26, 2022 10:59:15 AM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Amy McAnarney
5616 Norwood St
Fairway, KS 66205

From:	Andy Meehan
To:	Stakeholder Input
Subject:	Stop Postage Hikes
Date:	Tuesday, July 26, 2022 10:58:09 AM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Andy Meehan
23303 Boat Dock Dr E
Lewes, DE 19958

From: Julia Farrell
To: Stakeholder Input
Subject: Stop Postage Hikes
Date: Tuesday, July 26, 2022 10:57:48 AM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Julia Farrell
627 S Earl Ave
Lafayette, IN 47904

From: Susan Charlier
To: Stakeholder Input
Subject: Stop Postage Hikes
Date: Tuesday, July 26, 2022 10:57:41 AM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Susan Charlier
W7088 Rockdale Ln
Greenville, WI 54942

From: Juliana Bagherpour
To: Stakeholder Input
Subject: Stop Postage Hikes
Date: Tuesday, July 26, 2022 10:55:08 AM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Juliana Bagherpour
9503 SE 13th St
Vancouver, WA 98664

From:	Ashleigh Pritchard
To:	Stakeholder Input
Subject:	Study on USPS Rate Increases
Date:	Tuesday, July 26, 2022 10:54:19 AM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often.

As a small business owner, I have a vested interested in ensuring the affordability and accessibility of the mail. The currently planned price hikes will only serve to cripple a vital lifeline for every household in the country.

Sincerely
Ashleigh Pritchard
1304 Spruce St
Martinsville, VA 24112

From:	Jim McCarty
To:	Stakeholder Input
Cc:	Stephen Kearney
Subject:	Above inflation rate increases
Date:	Tuesday, July 26, 2022 9:35:42 AM

I am writing on behalf of Missouri's 40 non-profit electric cooperatives and as editor of the Rural Missouri magazine, the chief means of communication with the 600,000-plus electric cooperative members in the state. The back to back rate increases of 2021 and 2022 will force us to substantially raise the cost of Rural Missouri to our subscribers. This directly impacts their ability to provide timely information to electric cooperative members on matters of importance, including legal notices for board nominations, notices of annual meetings, rebates for energy efficient appliances, peak alert announcements and more. In my 37 years with the magazine, I have never seen postal rates rise this much and this often. These come at a time when printed publications also are facing monthly increases in the price of paper and ink.

Rural Missouri is part of a network of electric cooperative publications that together reach more than 9.8 million American households, making it the fourth largest magazine network in the United States. Our payments for mailing alone will total $1,354,000 in 2022 and I estimate that will rise to $1,434,546 in 2023. Considering the other electric cooperative magazines also pay the USPS a similar amount, our contribution to the USPS is close to $40 million per year. What's more, our circulation continues to increase as more and more homes and businesses are built in rural areas. It's one of the few growth areas the USPS can count on these days.

The effect of these continued increases in expenses is a push from our cooperative owners to shift from a printed publication to online magazines. Already every statewide, rural electric publication has a digital counterpart to its mailed copy. As more and more rural people find access to high-speed internet, the possibility of ending the mailed piece in favor of a digital magazine is becoming a reality.

These continued increases are driving discussion of ending our relationship with the USPS. Please consider how the loss of $40 million per year in income will affect the services the USPS provides. There are consequences to all actions, and that is certainly the case with these rate increases.

I appreciate your consideration of our situation.

Jim McCarty
Editor, Rural Missouri magazine
573-659-3402

www.ruralmissouri.coop

From: Mary Johnson
To: Stakeholder Input
Subject: USPS Rate Increases
Date: Monday, July 25, 2022 8:57:09 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Mary Johnson
660 Whitmore Rd
Detroit, MI 48203

From:	susan reis
To:	Stakeholder Input
Subject:	USPS Rate Increases
Date:	Monday, July 25, 2022 10:51:59 AM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
susan reis
3178 Canal St
Saint Charles, MO 63301

From: Liz Maute
To: Stakeholder Input
Subject: USPS Rate Increases
Date: Friday, July 22, 2022 11:49:18 AM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Liz Maute
18 Buffalo St
Hamburg, NY 14075

From: Frank Masek
To: Stakeholder Input
Subject: USPS Rate Increases
Date: Thursday, July 21, 2022 9:58:30 AM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Frank Masek
6049 Hi Tek Ct
Mason, OH 45040

From:	Jennifer Luna
To:	Stakeholder Input
Subject:	USPS Rate Increases
Date:	Wednesday, July 20, 2022 11:46:10 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Jennifer Luna
9020 Ridgeview Cir W
Tacoma, WA 98466

From:	Huong Wolf
To:	Stakeholder Input
Subject:	USPS Rate Increases
Date:	Wednesday, July 20, 2022 6:47:59 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Huong Wolf
47 Mellen St
Framingham, MA 01702

From: Carlos LLanso
To: Stakeholder Input
Subject: USPS Rate Increases
Date: Wednesday, July 20, 2022 5:18:39 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Carlos LLanso
75 Green St Ste 2
Clinton, MA 01510

From: Charles Donner
To: Stakeholder Input
Subject: USPS Rate Increases
Date: Wednesday, July 20, 2022 4:50:50 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Charles Donner
21 Ashwood Ct
Lancaster, NY 14086

From:	John Lester
To:	Stakeholder Input
Subject:	Comment on the impact of the size and timing of the latest postage rate increase
Date:	Wednesday, July 13, 2022 11:57:58 AM

To Whom It May Concern:

I have operated a small internet retail business for over 20 years. The products I sell are generally light in weight, but can easily exceed 1 cubic foot in volume. Until recently, I relied on USPS exclusively for delivery to customers. I can no longer afford to do so. The rapid pace of postal rate increases in the past two years has negatively impacted my business as customers increasingly turn to other merchants who can offer lower shipping rates.

I use Stamps.com to manage shipping. Their recent addition of UPS as an additional carrier has been a godsend. From my observation, UPS Ground averages half the cost of USPS Parcel Select/ Ground (even at commercial pricing), which has helped me claw some business back.

I fully understand that inflation and other macro-economic factors require periodic price adjustments. However, USPS hikes for domestic mail have (in my experience) been greater and more frequent than those of direct competitors. Have factors such as the recent postal reform legislation or increased parcel volume due to the explosive growth of online shopping been considered? Or is the plan instead to price the USPS out of the package delivery market?

Sincerely,

John Lester
Bal-Tech, Inc. (d/b/a Starship Modeler)
Lake Villa, IL
eMail: onezero@aol.com
Phone: (224) 372-7428

American Forest & Paper Association

July 22, 2022

Postal Regulatory Commission
901 New York Avenue, N.W.
Suite 200
Washington, DC
20268-0001

RE: Stakeholder Consultation Regarding Study on USPS Rate Increases

Dear Commissioners,

The American Forest & Paper Association respectfully submits our stakeholder input pursuant to the U.S. House of Representatives Report 117-79, directing the Postal Regulatory Commission (PRC) to study the factors that should impact rate increases proposed by the U.S. Postal Service (USPS) and the PRC rules adopted in November 2020.

Our comments reinforce our previously submitted PETITION FOR POST-LEGISLATION REVIEW OF THE SYSTEM FOR REGULATING MARKET-DOMINANT RATES AND CLASSES (Docket No. RM2022-6).

When the President signed the Postal Accountability and Enhancement Act on December 20, 2006, Congress anticipated the pricing system would enable the USPS to achieve sufficient revenues to cover all of its operating costs and statutorily mandated obligations while at the same time motivate the USPS to cut costs and become more efficient. In addition, Congress acted to prevent the "death spiral" many observers predicted for the USPS in which "declining business leads to higher rates which in turn leads to decline in business until it is too late to change course."

Subsequent to issuing Commission Order 5763, ADOPTING FINAL RULES FOR THE SYSTEM OF REGULATING RATES AND CLASSES FOR MARKET DOMINANT PRODUCTS, multiple factors have had significant material effects on the financial condition of the USPS. These include emergency relief funding from the CARES Act, the Postal Service Reform Act of 2022 (which relieved USPS of previously mandated obligations), and USPS revenue generation that exceeded its *Delivering for America* projections. Without taking these factors into account, the Commission, in issuing Order 5763, effectively modified the ratemaking system such that the pricing authority the Commission has given the Postal Service exceeds the levels needed to cover USPS operating costs and mandated statutory obligations.

While the Commission issued Order 5763 to enable the USPS to address its challenges by making "prudent pricing decisions", we are concerned the amount and frequency of intended rate increases by USPS undermine two essential elements required for businesses to stay with mail – rate stability and predictability. Our concerns were reinforced during the USPS Board of Governors meeting on May 5, 2022, where the Postmaster General stated: "The mailing industry needs to be prepared for continued use of our authority to raise prices on market-dominant products at an uncomfortable rate..."

We believe the increases allowed by the Commission's final rule will harm the mail supply chain and be self-defeating for the USPS, accelerating the reduction of mail volume otherwise handled through the USPS network and increasing migration to digital channels and alternate delivery methods.

The USPS is an important part of the American economy. AF&PA members depend heavily on the USPS to ensure their products and messages are delivered to their destination in a secure, timely and cost-effective manner.

We support the U.S. House of Representatives directive for the Commission to conduct a USPS Rate Increase study as outlined in House Report 117-79, and further encourage the Commission to respond to our petition to vacate Order No. 5763 and open a rulemaking docket to conduct a new review of the system of rates and classifications for market-dominant products.

Thank you for considering our views.

Respectfully submitted,

Mark Pitts
Executive Director, Printing-Writing, Pulp & Tissue

AMERICAN FOREST & PAPER ASSOCIATION
1101 K Street, NW, Suite 700
Washington, D.C. 20005

AF&PA serves to advance U.S. paper and wood products manufacturers through fact-based public policy and marketplace advocacy. The forest products industry is circular by nature. AF&PA member companies make essential products from renewable and recycle resources, generate renewable bioenergy, and are committed to continuous improvement through the industry's sustainability initiative — Better Practices, Better Planet 2030: Sustainable Products for a

Sustainable Future. The forest products industry accounts for approximately four percent of the total U.S. manufacturing GDP, manufactures nearly $300 billion in products annually and employs approximately 950,000 people. The industry meets a payroll of approximately $60 billion annually and is among the top 10 manufacturing sector employers in 45 states.

north shore animalleague america

RESCUE • NURTURE • ADOPT • EDUCATE

Postal Regulatory Commission
901 New York Avenue, NW Suite 200
Washington D.C. 20268

July 6, 2022

Dear Commissioners,

I'm writing to you, as requested, in regard to the directive from the House Appropriations Committee expressing concern that the August 20, 2021 postal rate increase exceeded what was necessary. Specifically, that the rate hike did not account for the impact of the Covid pandemic on USPS users (such as North Shore Animal League America), or for the increased USPS package revenues that surpassed expectations in 2020, nor the emergency funding provided to the USPS under the 2020 Covid Relief package.

As a nonprofit organization with no government funding, North Shore Animal League America's lifesaving mission was certainly affected by the postal increase levied beginning on August 20, 2021. Of the approximately 20 million pieces North Shore Animal League America put in the mail in 2021, nearly 6.7 million incurred the postage increase of up to 7%. In 2021 people and organizations were still shaken by the trials that Covid engendered, so the timing was quite poor indeed. The differential between the prior rate and post-August 20, 2021 rate went to the USPS instead of toward our vital mission.

Together with other organizations that are providing information such as ours, the above will speak to the concerns of the PRC and the House Committee.

Sincerely,

Jill M. Burkhardt

Jill M. Burkhardt
Senior Vice President of Development
North Shore Animal League America

north shore animalleague america

US POSTAG
ZIP 11050
02 4W
0000375607

Postal Rate Commission
901 New York Ave., N.W., Ste. 200
Washington, DC 20268

RESCUE • NURTURE • ADOPT • EDUCATE

16 Lewyt Street • Port Washington • New York • 11050 • animalleague.org

From:	malorn 0013
To:	Stakeholder Input
Subject:	USPS
Date:	Sunday, July 3, 2022 11:10:23 AM

I recommend a postal rate increase that would allow the USPS to fund its own operations. Since legislative action restricting income and lack of legislative action to fund the lack of income caused the problem, the legislators should pay the USPS debts and fund any shortages as they occur.

I could say more, but the United States Government Accountability Office reports cover the problems more comprehensively at <https://www.gao.gov/highrisk/usps-financial-viability>. More information may become available at <https://www.gao.gov/agencies/united-states-postal-service> and <https://www.gao.gov/search?keyword=usps>.

IN GOD WE TRUST

From:	Cathy Wood
To:	Stakeholder Input
Subject:	USPS Rate Increases
Date:	Friday, July 1, 2022 9:40:31 AM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Cathy Wood
909 Minota Ave
Akron, OH 44306

From: wayne d
To: Stakeholder Input
Subject: USPS Postage Rates
Date: Thursday, June 30, 2022 10:05:51 PM

To Whom It May Concern;

Please allow me to personally advise very careful consideration of any and all postage rate increases, prior to approval.

As a 31 year USPS City Carrier (ret.), may I express my lack of trust in senior & mid-level postal management's abilities and motives when making critical decisions.
My opinion is not helped by the nearly certain circumstance of Mr. DeJoy's appointment to PMG, as a highly inappropriate political appointment. The Postal Reorganization Act of 1970 was intended, in part, to eliminate parisan political influence from this position, in perpetuity.
Sadly however, powerful officials seem to have found a way to deviate from this requirement.
It has been reliably reported in the past, that several well qualified candidates were overlooked when Mr. DeJoy was inserted, late in the process.

I am very proud of my career service in the USPS and a frequent supporter, as well.

Thank You for this opportunity.

Wayne DeVries
livefaithrider@outlook.com

From: Kristen McKiernan
To: Stakeholder Input
Cc: Steve Belmonte; Kristen McKiernan
Subject: AccuZIP Request to PRC
Date: Thursday, June 30, 2022 3:01:54 PM
Attachments: image002.png
AccuZIP_PRCResponse_20220630.pdf
Importance: High

Postal Regulatory Commission,

Please see attached for review and consideration.

Kind regards,

Kristen McKiernan
President
www.accuzip.com/chat
www.accuzip.com/support

800.233.0555 (Sales)
805.461.7300 (Support)
877.839.6531 (Facsimile)

OUR TECHNOLOGY. YOUR SUCCESS.

3216 El Camino Real
Atascadero, CA 93422-2500
www.accuzip.com

accuzip

OUR TECHNOLOGY. YOUR SUCCESS.

Postal Regulatory Commission
901 New York Ave., N.W.
Ste. 200, Washington, DC
20268-0001
stakeholderinput@prc.gov

This letter is in response to the request by the Postal Regulatory Commission asking for comments about how the current ratesetting process should be changed. AccuZIP, Inc. hereby formally requests that with the increase in frequency of USPS® Rate Changes, that the USPS provide Software Vendors increased notice of the FINAL Mailing Statements and Rules. For example, vendors had less than 30 days' notice from the FINAL documents for the July 2022 rate changes, i.e., prices, SKU price files, postal forms, including the **Federal Register** / Vol. 87, No. 113 / Monday, June 13, 2022 / Rules and Regulations, etc… to make our changes, build the new releases, and distribute to our customers. Many MSP's prepare mail 30-days or more in advance and need our updates earlier. The need for more advanced FINAL information is evident in the latest MSDG Meeting Agenda item that reads, "What is the plan for mailers submitting with software that has not yet caught these changes?"

As a CASS™ and PAVE™ GOLD certified vendor, we pride ourselves on providing our customers accurate rate calculations, prices, SKUs and postal documentation. The current 30-day timeframe does not allow for adequate programming and Q&A testing given the frequency of rate changes. This has put an unreasonable burden on our development teams and support staff and jeopardizes the quality of our products, services, and brand. The short-timeline for FINAL release of the above assets creates potential liability with SLA's and consumer confidence because of numerous updates with unnecessary patches related to the short timeline and limited QA and regressive testing.

We request to have a minimum of 60-days from the FINAL release of the documents to make our changes.

Sample of inadequate 30-day Notice window currently provided:

July 2022 Price Change
Starting July 10, 2022

	Status	Revised
Prices		
July 2022 Price File - Excel	Final	06/09/2022
July 2022 Price Files - CSV	Final	06/09/2022
July 2022 Price Files Change Log		05/13/2022
Notice 123		
July 2022 - Notice123 PDF	Final	06/09/2022
USPS SKU Price Files		
July 2022 - SKU Price Files - Excel	Final	06/14/2022
July 2022 - SKU Price Files - Pipe-Delimited	Final	06/14/2022
SKU Delta Report		
July 2022 SKU Delta Report	Final	06/14/2022
Automated Price Files (APF)		
July 2022 - APF Postage	Final	06/09/2022
July 2022 - APF Service	Final	06/09/2022

Please send questions or comments to steve@accuzip.com cc: kristen@accuzip.com

Sincerely,

Steve Belmonte – CEO
Kristen McKiernan – President
AccuZIP, Inc.

From: Chris Wojcek
To: Stakeholder Input
Subject: RE: Postal Service Price Hikes
Date: Wednesday, June 29, 2022 1:05:05 PM

As a consumer, I believe the USPS needs greater autonomy. Dozens of other nations have postal systems that put ours to shame.

Like many issues in the United States (immigration, energy, real estate pricing, abortion rights, etc), the response of maintaining the ineffective status quo is not a solution at all. Instead, I would err on the side of allowing the USPS to operate as a company rather than a revenue-less service expected to continue operating in the red.

Many countries, some of which are still developing, have utilized their postal services far better than we do. In fact, many nations were able to improve their postal systems during the Pandemic rather than see them crumble.

The current USPS must make decisions that allow it to generate income. Most notably, as other nations have, the inclusion of financial services, senior care services, and even grocery delivery.

Throughout our nation's history, we have only continued weakening our postal service rather than strengthen it. We've seen them lose their support from the armed services branches. We've seen them maintain inefficient processes for decades. We've seen underpaid and underutilized staff begrudgingly perform their rolls poorly. We have seen large brick buildings that sit mostly empty day in and day out cost a fortune to operate.

Any improvement we can make in our postal operations is a welcomed change. Allowing them to raise or lower postage rates as needed is the least we can do.

From: shah zaman
To: Stakeholder Input
Subject: Postal rates study
Date: Wednesday, June 29, 2022 1:01:16 AM

Esteemed Commission Members,

The United States postal agency is an ingrained part of the Constitutional Articles (Article I, Section 8, Clause 8) known as the Postal Code.

As such the Postal Service serves as a public good for all Americans, regardless of their income, and does not seek to gain financial profit. The Postal Service seeks organizational objectives and ways only to better serve American citizens, by keeping mail affordable so that no undue burden is placed on the greater populace.

Even with the establishment of for-service businesses (FedEx, UPS, etc.), the United States Postal Service (USPS) enjoys greater popularity among citizens of all 50 States, due to the trust and accountability offered by its post offices throughout the land.

As stakeholders in utilizing the services offered as stipulated in the Constitution of the United States, I am NOT in favor of increasing Postal rates that would adversely affect the greater populace. I appeal to the Commission to establish a break-even pricing scheme that is independent of the financial turmoil due to inflation or other calamities.

Sincerely,
Shah Zaman

From:	Suzanne Garcia
To:	Stakeholder Input
Subject:	USPS Rate Increases
Date:	Tuesday, June 28, 2022 11:00:59 AM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Suzanne Garcia
631 Bungalow Ct
Beavercreek, OH 45430

From:	vettemse@aol.com
To:	Stakeholder Input
Cc:	vettemse@aol.com
Subject:	OUTRAGEOUS RATES 6/2/2022
Date:	Thursday, June 2, 2022 5:30:12 PM

Why is the USPS buying television time(not to mention
the cost of producing that horrible ad and gawdawful music) to
remind everyone that there is a post office nearby--
UPS even takes in usps mail.

AND then USPS has the gall to continually--
like a bad habit or a toothache--raise rates.

Source WIKI which I posted today on a website--
and that's just the last 10 years!!!
$58(2022) - $.45 (2012) = $.13

13/45= 28%%%%%%%%%%

Baloney.
Never more sincerely,

Mardell E. Theiler

January 22, 2012	.45
January 27, 2013	.46
January 26, 2014	.49
May 31, 2015	.49
April 10, 2016	.47[9]
January 22, 2017	.49[10]
January 21, 2018	.50[12]
January 27, 2019	.55
January 26, 2020[14]	.55
January 24, 2021[16]	.55
August 29, 2021[17]	.58

1. ^ 1 oz is 28.34 g.

From:	Stephanie Buka
To:	Stakeholder Input
Subject:	USPS Rate Increases
Date:	Monday, June 13, 2022 2:49:22 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Stephanie Buka
1905 St James Pl
Wexford, PA 15090

From:	R English
To:	Stakeholder Input
Subject:	Postage
Date:	Thursday, June 2, 2022 4:53:29 PM

As a 12-year online seller I've drastically seen my overseas purchases plummet to near zero because of the continual increase of overseas postage rates. I've also seen a decrease in large size item purchases because of the continual rate increases of these items especially golf clubs as this size box requires an additional $15 postage on top of standard postage. Another problem is shipping items across the country from Virginia to California the rates are extremely discouraging. The vast majority of my purchases are in Florida New York and California. Florida and New York buyers have not evaporated like my West Coast buyers. The USPS is not helping online sellers sell, which have grown substantially as you realize. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often, and I would argue they need to go down to reasonable levels.

Rebecca is English, Forsythia Hill Vintage, 2623 Lawrence Road Charlottesville Virginia 22901

From: Mark Stewart
To: Stakeholder Input
Subject: Impact of large package surcharge
Date: Wednesday, June 1, 2022 11:50:51 PM

I just wanted to comment on the impact of the new large package surcharge on my business, My Antique Store, 1007 West Delmar Ave, Godfrey, Il 62035. My business is a small three person antique shop. We sell in the shop and online. I sell a lot of sets of dinner plates that ship in 17x17x16 box. This is the size box it takes to safely ship the plates. Shipping rates have been going up. Then in addition to the higher rate they add a large box surcharge of $15. If my box was 15X15X15 no surcharge. Why is there a surcharge after years of my business shipping these "large" packages? They don't want my business. Most business want more business. It increases the efficiency and reduces costs. Only the post office see more business as a cost instead of an opportunity. They will be happy when I stop shipping my packages.

These shipping cost are pricing my items out of the market. I can tell you stories about an insurance claim that are denied even when the post office destroys the box, repackages the items that are destroyed in a new box, includes a note in the box apologizing for destroying my shipment, shipped it back to me without sending it to my customer. I refunded my customer, filed an insurance claim that was quickly turned down. The Post office said it was not their fault even though I sent them a picture of the note they wrote that said it was.

Shipping service levels that have taken a dive over the last few years. Higher shipping cost and falling service is not the way for the post office to serve American business.

Thanks
Mark Stewart
Owner My Antique Store (in business for over 30 years, shipping all over the US and World from My Antique Store www.myantiquestore.com)

From:	Laura Haggarty
To:	Stakeholder Input
Subject:	Postal rate increases
Date:	Thursday, June 2, 2022 7:40:10 AM

My name is Laura Haggarty and I own a small ecommerce business in Kentucky. I use the USPS almost exclusively to ship my items to my customers. The continued rate increases have been harming my business, and I wish they would slow down a bit. I sell greeting cards, among other things, and there's only so much I can increase the price to cover a postal rate increase before I price myself completely out of the market. It's the core around which my business is based, and my margin is so slim I can't take much more.

Please consider the needs of small home-based businesses and reduce the frequency as well as amount of rate increases.

Thank you.

Laura Haggarty
12417 KY HWY 330 W
Berry, KY 41003

From: I"m 75, a resident of Upland, CA & want to sign up for the covid vaccine
To: Stakeholder Input
Date: Sunday, June 5, 2022 12:20:19 PM

I have a small internet business & the consistent rate increases are dramatically affecting my business & other internet business as well. I will have to try & find another way to ship if they keep raising their rates every 6 months. Their consistent increases are going to force small businesses like mine to close, because people can't/won't pay that much for shipping items. I support myself this way & many, many others do as well. In the last 2 months they have lost 3 packages & never found them, so I'm out what the item cost & the shipping cost I paid. In the 9 years I've been doing this, they've only lost 1 item & not found it. This is happening to other internet business as well. They're costs are going up & their service is going way down. They're losing lots of packages & the searches or the missing mail forms don't help at all, as they never find anything. This needs to stop & the constant rate increases need to stop as well.

Thank you,
Carla

Sent from Mail for Windows

From: Donna Lund
To: Stakeholder Input
Subject: USPS Rate Increases
Date: Monday, June 13, 2022 10:47:21 AM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Donna Lund
2723 Moores Valley Dr
Baltimore, MD 21209

From:	Brent Alexander
To:	Stakeholder Input
Subject:	Postage Rate Hikes
Date:	Thursday, June 2, 2022 1:47:07 PM

I am a small business owner who relies on shipping book by Media Mail. In my opinion, the proposed rate hikes are beyond reasonable. I certainly can understand keeping pace with inflation, the the proposed Media Mail hikes go way beyond that and excessive increases when compared to the increases in the other classes of service.

-Brent Alexander
303 Longbow Trl
Osprey, FL 34229

From:	Berman, Eric S.
To:	Stakeholder Input
Subject:	Motion for Issuance of Information Request
Date:	Monday, June 6, 2022 3:55:18 PM
Attachments:	MPA CHIR Motion (Stakeholder Input for MD Rate Report).pdf

MPA – The Association of Magazine Media, respectfully submits the attached Motion for the Issuance of an Information Request to the United States Postal Service. This motion relates to the Commission's request for stakeholder input on whether the Commission's ten-year review final rules properly accounted for the impact of the COVID-19 pandemic, including emergency funding provided to the Postal Service.

Respectfully submitted,
Eric Berman
Counsel to MPA

Eric S. Berman, Esq. | Venable LLP
t 202.344.4661 | f 202.344.8300 | m 202.841.4177
600 Massachusetts Avenue, NW, Washington, DC 20001

ESBerman@Venable.com | www.Venable.com

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

In re Stakeholder Consultation Regarding Study On USPS Market-Dominant Rate Increases)

MPA – THE ASSOCIATION OF MAGAZINE MEDIA'S MOTION FOR THE ISSUANCE OF AN INFORMATION REQUEST TO THE UNITED STATES POSTAL SERVICE

(June 6, 2022)

Pursuant to 39 CFR § 3010.170(e), MPA – The Association of Magazine Media ("MPA") respectfully requests that the Commission, Chairman Kubayanda, or the Presiding Officer issue an information request to the U.S. Postal Service to obtain answers to the attached questions.

The information sought pertains to the Commission's invitation for interested persons to provide input on concerns raised by the House of Representatives Appropriations Committee regarding the size and timing of market-dominant rate increases authorized by the Commission following the ten-year review. On May 26, 2022, the Commission invited stakeholder consultation regarding its Congressionally required study of Postal Service rate increases. The study is to address, among other factors, whether the Commission's revised regulations authorizing these rate increases properly accounted for the impact of the COVID-19 pandemic, including $10 billion of emergency funding provided to the Postal Service.

The referenced $10 billion emergency funding was to be provided "if the Postal Service determines that, due to the COVID–19 emergency, the Postal Service will not be able to fund operating expenses without borrowing money" and "to be used for such operating expenses."

Answers to these questions will ensure that interested parties can provide meaningful input on whether the emergency funding provided to the Postal Service was properly accounted for in designing the revised ratemaking system. Obtaining this information from the Postal Service "is likely to materially assist the Commission in the conduct of its proceedings, in the preparation of its reports, or in the performance of its functions under title 39 of the United States Code." 39 CFR § 3010.170(a).

Respectfully submitted,

/s/ Eric S. Berman

Eric S. Berman
Venable LLP
600 Massachusetts Ave., N.W.
Washington, DC 20001
(202) 344-4661
esberman@venable.com

Counsel to MPA – The Association of Magazine Media

June 6, 2022

Proposed Questions

1. Provide information explaining in detail the basis for the Postal Service's determination "that, due to the COVID-19 emergency, the Postal Service [would] not be able to fund operating expenses without borrowing money;"

2. Provide a complete listing of the Postal Service's operating expenses for which the emergency funds have been or will be used; and

3. Provide all documents that the Postal Service submitted to the U.S. Treasury in support of the Postal Service's request for the $10 billion in emergency funding.

From: wendy mcconnell
To: Stakeholder Input
Subject: Stop Postage Hikes
Date: Monday, August 1, 2022 9:20:27 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
wendy mcconnell
10421 W Red Mountain Rd
Littleton, CO 80127

From: Vikki Isaacson
To: Stakeholder Input
Subject: Stop Postage Hikes
Date: Wednesday, August 3, 2022 12:04:19 AM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Vikki Isaacson
4810 Coquina Key Dr SE
St. Petersburg, FL 33705

From:	Tina Nye
To:	Stakeholder Input
Subject:	Stop Postage Hikes
Date:	Tuesday, August 2, 2022 10:39:36 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Tina Nye
PO Box 5812
Harrisburg, PA 17110

From:	Raven Hannah
To:	Stakeholder Input
Subject:	Study on USPS Rate Increases
Date:	Tuesday, August 2, 2022 11:29:54 AM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Raven Hannah
6A South St
Chesterfield, MA 01012

From:	Patricia Aduddle
To:	Stakeholder Input
Subject:	Study on USPS Rate Increases
Date:	Monday, August 1, 2022 9:18:34 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Patricia Aduddle
18081 Placita Del Silbido
Sahuarita, AZ 85629

From: Nancy Curtiss
To: Stakeholder Input
Subject: Study on USPS Rate Increases
Date: Wednesday, August 3, 2022 10:58:01 AM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Nancy Curtiss
1263 Juniper Dr
Estes Park, CO 80517

From:	Lisa Perfetti
To:	Stakeholder Input
Subject:	Study on USPS Rate Increases
Date:	Tuesday, August 2, 2022 5:24:11 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Lisa Perfetti
10 Hadden Ln
Troy, NY 12180

From: Karen Holmes
To: Stakeholder Input
Subject: The backbone of any economy is small business.
Date: Monday, August 1, 2022 8:20:58 PM

Hello,

I am a small business owner who ships my product through the post office. I am also like most other people in the world who buy online. The internet and the postal service has allowed average people all over the world to sell globally, door to door. Everyone benefits by an efficiently run postal service.

The changes that have been made by Louis DeJoy have created chaos in the USPS. The original idea of UPS to shift its last mile deliveries to the post office was welcomed by the USPS because it was a win-win agreement, but DeJoy took what benefited the post office and turned it into a fiasco.

The zip code system worked very well by allowing the mail to keep moving in the system. Now, the mail sits a long time waiting for the competitor to pick it up and transfer it over to the post office system. Today, I am waiting for two packages that have been sitting for four days waiting to be turned over to the post office. Recently, I waited over a month to get a package. I order from a company on an annual basis and I have tracked a package go around in circles for nearly a week.

Louis DeJoy should be investigated for conflict of interest. As a former owner of a competitor to the post office, his intentions should be considered suspect considering the chaos he has caused. The backbone of any economy is small business, and if he is indeed undermining the USPS, as it appears he is doing, he is undermining the US economy to further his own interests.

Karen Holmes
Brookings, Oregon

Sent from Mail for Windows

From: Jessica Flores
To: Stakeholder Input
Subject: Stop Postage Hikes
Date: Tuesday, August 2, 2022 6:07:07 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,
Jessica Flores
3256 4th Rd
Bremen, IN 46506

From: Jennifer Pettinger
To: Stakeholder Input
Subject: USPS Rate Increases
Date: Tuesday, August 2, 2022 10:00:07 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Jennifer Pettinger
2105 W 2300 S
West Valley City, UT 84119

From: Elaine Scott
To: Stakeholder Input
Subject: Study on USPS Rate Increases
Date: Monday, August 1, 2022 6:29:58 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Elaine Scott
1831 McDowell St
Augusta, GA 30904

From:	Cindy Baron
To:	Stakeholder Input
Subject:	Study on USPS Rate Increases
Date:	Tuesday, August 2, 2022 5:42:48 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Cindy Baron
10837 Melvin Ave
Los Angeles, CA 91326

From: Cathy Rundell
To: Stakeholder Input
Subject: Stop Postage Hikes
Date: Monday, August 1, 2022 1:08:53 PM

Dear Secretary Barker:

The U.S. Postal Service is raising rates yet again, despite the Postal Service Reform Act, which saves USPS billions of dollars each year. Please take back the additional rate setting authority you granted USPS. It is no longer necessary.

Thank you,

Cathy Rundell
7506 24th Ave NW
Seattle, WA 98117

From:	Bonnie Seifert
To:	Stakeholder Input
Subject:	USPS Rate Increases
Date:	Tuesday, August 2, 2022 7:01:36 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Bonnie Seifert
19318 Alpine Dr
Lawrenceburg, IN 47025

From: Billy Gibson
To: Stakeholder Input
Subject: Postal increases
Date: Tuesday, August 2, 2022 11:07:37 AM

To: Postal Rate Commission
From: Billy Gibson, Dir. Of Communications, South Dakota Rural Electric Association
Re: Rate increases

Members of the Postal Rate Commission,

I am writing on behalf of South Dakota's 28 not-for-profit electric cooperatives and as managing editor of Cooperative Connections magazine, the flagship publication of South Dakota's electric cooperative system with a monthly circulation of 125,000. The consecutive rate increases imposed by the USPS in 2021 and 2022 will force us to substantially raise the cost of mailing Cooperative Connections to our subscribers. This exceptionally sharp rise in postal rates drastically inhibits the ability of our subscribing cooperatives to deliver timely information to their members on matters that contribute to the success of their respective democratically controlled organizations, including required legal notices for board nominations, mandatory notices of annual meetings, rebates for energy efficient appliances, capital credits allocations, the introduction of new member-focused programs, planned maintenance outages and more. In my 25 years as an electric cooperative statewide magazine editor and past president of the Statewide Editors Association, I have never seen postal rates rise this precipitously in such a short period of time, and I am concerned about our capacity to keep pace with these increases as they are confronting us at a time when print publications also are facing substantial monthly increases in the price of paper and ink.

Cooperative Connections is an integral part of a national network of electric cooperative print publications that together reach more than 9.8 million American households, making it the fourth largest magazine network in the country. With these recent increases, this network of publications is projected to spend roughly $40 million of our members' money on magazine postage expenses next year. The practical effect of these continued increases is a push from our cooperative managers and leaders to seriously consider a shift away from printed magazines to online versions only. As more and more rural citizens receive access to high-speed broadband internet service, the possibility of discontinuing the mailed piece in favor of a digital magazine is becoming a reality.

To be frank, these continued increases with no end in sight are driving discussion of ending our relationship with the USPS. My request is that you please consider how the loss of $40 million per year in income will affect the services the USPS provides. We are grateful for these services, but we are also accountable to our members and must keep their fiduciary interests in mind.

I appreciate your consideration of our perspective.

Respectfully yours,
Billy Gibson

Billy Gibson MJ, CCC
Director of Communications and Member Relations
South Dakota Rural Electric Association
222 W Pleasant Drive | PO Box 1138 | Pierre SD 57501
t. 605.224.8823 | c. 225.405.4910 | www.sdrea.coop

From: Barbara Hendel
To: Stakeholder Input
Subject: Study on USPS Rate Increases
Date: Wednesday, August 3, 2022 12:43:52 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Barbara Hendel
2503 Rainer Rd
Chester Springs, PA 19425

From:	Amber McDonough
To:	Stakeholder Input
Subject:	Study on USPS Rate Increases
Date:	Tuesday, August 2, 2022 5:07:46 PM

Secretary Barker:

I urge you to rescind the additional rate setting authority you granted the U.S. Postal Service and begin a new review process. Now that the Postal Service Reform Act is law, USPS no longer needs to raise rates so often. The American people deserve to gain from postal reform.

Sincerely
Amber McDonough
19544 Telbir Ave
Rocky River, OH 44116

From: Russel Deneau
To: Stakeholder Input
Subject: USPS Rate Increases
Date: Thursday, August 4, 2022 12:34:33 PM

Dear Secretary Barker:

Please reconsider the additional rate setting authority you gave the U.S. Postal Service. By removing the retiree health care prefunding requirements to free up billions of dollars each year, the Postal Service Reform Act negates the need for the postage increases that were needed before to keep the Postal Service delivering. The American people deserve to benefit from the new law.

Thank you,
Russel Deneau
5636 W Evening View Dr
Herriman, UT 84096