

**BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001**

**Evolutionary Network Development
Service Changes**

Docket No. N2006-1

**DOUGLAS F. CARLSON
RESPONSE TO NOTICE OF INQUIRY NO. 1**

April 4, 2006

The Postal Service's request for an advisory opinion creates the illusion that the only change in service that customers may experience as a result of plant consolidations is an upgrade or downgrade in the service standards for various classes of mail. In reality, when the Postal Service consolidates mail processing for a three-digit ZIP Code area to a plant located farther away than the former plant, collection times at post offices and for street collection boxes in the service areas of both plants may change. In fact, the likelihood of collection times moving to earlier hours ranges from modest to high. For example, the Postal Service currently is consolidating outgoing mail processing operations for Olympia, Washington, to Tacoma. A Postal Service spokesman recently admitted that some collection times in Olympia are likely to change to earlier hours. When outgoing mail processing operations for the Salinas P&DF were consolidated into the San Jose P&DC circa 2002, the Postal Service cut back collection times in cities in the original service area of the San Jose P&DC. Some cities in Imperial County, California, do not even have 5 PM collections at the post office. These cities likely lost 5 PM collections when outgoing mail processing operations were transferred from Palm Springs to the more-distant facility in San Bernardino.

Chapter 3 of the *Postal Operations Manual* prescribes minimum national service standards for collections. Every year, the Postal Service slowly erodes these service standards and rejects or ignores customer complaints about the failure to comply with the agency's own regulations. The latest example of shifts to earlier collection times appears in *The Birmingham News* today.¹ As the article reveals, public notice and input are conspicuously absent from the process.

By gradually rendering these service standards irrelevant, the Postal Service apparently seeks to avoid its obligation pursuant to 39 U.S.C. § 3661(b) to request an advisory opinion from the Commission before implementing a change in the nature of postal services that will affect service on a nationwide or substantially nationwide basis. No reasonable person can argue that a failure to provide 5 PM collections for high-volume collection boxes and at post offices raises a question of whether the Postal Service is providing adequate and efficient postal services within the meaning of 39 U.S.C. § 3661(a). Yet the Postal Service continues to erode service, and the Postal Service will not permit a public dialogue.

The Postal Service's Area Mail Processing (AMP) procedure is flawed because it fails to consider the effect of an AMP proposal on the agency's ability to meet the national service standards for collections. Once a consolidation is complete, the Postal Service's answer, if a customer is fortunate enough to receive one, to a complaint about early collection times is that the plant is located far away, and the Postal Service needs to deliver the mail to the plant by a particular hour.

In this proceeding, the Postal Service is asking for an advisory opinion that is virtually impossible to provide based on the narrow and vague nature of the Postal Service's request. The Commission cannot fulfill its statutory duty to

¹<http://www.al.com/business/birminghamnews/index.ssf?/base/business/114414224212690.xml&coll=2>

provide an advisory opinion unless the Commission considers all effects of plant consolidations on service — specifically including collection times. The Postal Service presently is failing in its statutory duty to seek the Commission's advice, and the public input that a Commission hearing provides, on the effect of plant consolidations on all aspects of service, including collections. Instead, the Postal Service has decided to focus on one aspect of service and to provide so little information about changes that participants can hardly offer meaningful comments.

Plant consolidations represent critical turning points in postal operations that will affect postal services for decades to come. The Commission should not let the Postal Service's failure to ask the right questions hinder the Commission from answering them.

Respectfully submitted,

Dated: April 4, 2006

DOUGLAS F. CARLSON