

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

**Evolutionary Network Development
Service Changes**

Docket No. N2006-1

DOUGLAS F. CARLSON
INITIAL BRIEF

October 19, 2006

Chapter 3 of the *Postal Operations Manual* contains the Postal Service's national service standards for collections. For example, for all city-delivery offices, POM section 322.1 requires a final collection on weekdays at 5:00 PM or later for every collection box located at a post office, station, or branch and for every collection box that receives an average weekday volume of 100 pieces of mail or more. The national service standards also are evidence of the minimum level of service necessary to meet the statutory service mandates specified in the Postal Reorganization Act.

Plant consolidations may encourage, necessitate, or prompt changes in collection times. The Postal Service's Area Mail Processing (AMP) guidelines¹ fail to consider the effect of an AMP proposal on the agency's ability to provide collection services consistent with the national service standards. The Commission should advise the Postal Service to modify the AMP guidelines to include a mandatory review of the Postal Service's ability to meet the national service standards for collections if a plant consolidation is implemented.

Respectfully submitted,

Dated: October 19, 2006

DOUGLAS F. CARLSON

¹ USPS-LR-N2006-1/3.