

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

First-Class Mail and Periodicals
Service Standard Changes, 2021

Docket No. N2021-1

STEVE HUTKINS
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO
UNITED STATES POSTAL SERVICE

(May 18, 2020)

Pursuant to 39 C.F.R. § 3010.311, I hereby submit institutional interrogatories and requests for production of documents to United States Postal Service.

The instructions contained in my interrogatories to USPS, SH/USPS-1-1-4, are incorporated herein by reference.

Any part of these interrogatories may be re-directed to a Postal Service witness, as necessary.

Respectfully submitted,

Dated: May 18, 2021

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SH/USPS-1-1. Please refer to the 10-Year Strategic Plan, “Delivering for America: Our Vision and Ten-Year Plan to Achieve Financial Sustainability and Service Excellence.” Please refer to these two tables in Appendix A: Figure 28, “The Postal Service Base Case 10 Year Financial Projection” (p. 46) and Figure 35, “10-Year Delivering for America Projected Profit and Loss Statement – With USPS Initiatives” (p. 51).

Please confirm that the volume and revenue projections in Figure 28 (for Total Mail and Package Volume, Market Dominant Revenue and Competitive Revenue) *do not* factor in the volume that may be lost due to use of the new price cap on Market Dominant products and the due to a change in service standards (as discussed in the testimony of Mr. Thress), whereas the revenue projections in Figure 35 *do* factor in these projected losses. If not confirmed, please explain.

SH/USPS-1-2. If the revenue projections in Table 35 do factor in projected revenue losses due to the new price cap and changing service standards, please provide projections for annual mail and package volume with these initiatives, similar to the row for volumes in Table 28.

SH/USPS-1-3. Please provide a copy of the pages of the TARL/TISR technical report list index for the subject heading "Service Standards."

SH/USPS-1-4. Please provide a copy of the title page and table of contents for each of the TARL/TISR technical reports categorized under the heading “Service Standards” in that report index.