

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

First-Class Mail and Periodicals
Service Standard Changes, 2021

Docket No. N2021-1

RESPONSES OF WITNESS STEVE HUTKINS TO
UNITED STATES POSTAL SERVICE'S INTERROGATORIES
(USPS/SH-RT1-1)

(June 8, 2021)

I hereby provide my responses to the Postal Service's Interrogatories USPS/SH-RT1-1 issued on June 7, 2021. Each question is stated verbatim and followed by the response.

Respectfully submitted,

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USPS/SH-RT1-1: On page 15, lines 3 and 4 of your testimony, you state that “For SCF Reno NV 895, 78 percent of volumes would be 4- or 5-day.”

- a. Please confirm that that figure is incorrect based on the cited library reference (SH-LR-N2021-1/1).
- b. Please refer to SH-LR-N2021-1/1. The excel tab labeled “Fig 8 % vol SSD 4 or 5” indicates, on row 819, that the correct figure for SCF Reno NV 895 is “53.07%.” Please confirm that figure or, if that is not correct, provide the correct figure.
- c. Please confirm that the 53% figure in SH-LR-N2021-1/1 is based solely on destinating volumes.
- d. Please confirm that the figure would be 37% if originating volumes were included as well, or, if that is not correct, provide the correct figure.
- e. If you still believe that the 78% figure provided is accurate, please provide any documents used to arrive at that figure

RESPONSE:

- a. Confirmed.

SCF Reno NV 895 was mistakenly cited as an example due to an inadvertent editing error. I will submit a notice of errata and corrected testimony with the following sentence:

“For SCF Las Vegas NV 890, 68.4 percent of volumes would be 4- or 5-day.”

- b. See response to (a).
- c. See response to (a).
- d. See response to (a).
- e. See response to (a).