



American Postal Workers Union, AFL-CIO

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**Re: Comments of the American Postal Workers Union, AFL-CIO
on Advance Notice of Proposed Rulemaking, USPS Proposal to
Revise Service Standards for First-Class Mail, Periodicals, and
Standard Mail**

The American Postal Workers Union, AFL-CIO (APWU) submits these comments in response to the United States Postal Service's Advance Notice of Proposal to Revise Service Standards for First-Class Mail, Periodicals, and Standard Mail, published in the Federal Register on September 21, 2011.

The APWU vehemently opposes the USPS proposal to eliminate 60 percent of existing mail processing facilities and to make corresponding cuts in service standards. If adopted, this proposal would deprive postal customers of needed service, damage the economy, and drive customers away from the Postal Service.

It is worth noting that the proposal acknowledges what the Postal Service has repeatedly denied regarding the closure and consolidation of mail processing facilities: Slashing the mail processing network will result in drastic cuts in service to the American people. The elimination of overnight delivery of first-class mail and periodicals as well as a reduction in the range of two-day delivery would impose a significant hardship on postal customers. And, in addition to the reductions specifically discussed in the proposal, the changes would likely destroy Express Mail and Priority Mail.

Furthermore, the proposed changes are contrary to the objectives of the Postal Reorganization Act (the Act) and fail to take into account all the factors the Postal Service is required to consider when setting service standards.

Section 3691(b)(1) of the Act provides that when the Postal Service proposes to revise by regulation the service standards for market-dominant products these standards shall be designed to "enhance the value of postal services to both senders and recipients," "preserve regular and effective access to postal services in all communities, including those in rural areas or where post offices

are not self- sustaining,” and “reasonably assure Postal Service customers delivery reliability, speed and frequency consistent with reasonable rates and best business practices.”

The proposed rulemaking fails to meet these objectives.

The proposed changes in service standards also fail to consider all of the factors specified by the Act. The proposal focuses on mail volume (Factor 4) and costs (Factor 6), but fails to demonstrate attention to “the degree of customer satisfaction with Postal Service performance in the acceptance, processing and delivery of mail” (Factor 2) or “the needs of Postal Service customers, including those with physical impairments” (Factor 3). The proposal also omits any concern for the additional policies of Title 39 (Factor 8) including Section 101 which provides that the “Postal Service shall be operated as a basic and fundamental service provided to the people.... It shall provide prompt, reliable and efficient services to patrons in all areas The costs of establishing and maintaining the Postal Service shall not be apportioned to impair the overall value of such service to the people.” [39 U.S.C. § 101(a)] Section 101 also requires the Postal Service to: “provide a maximum degree of effective and regular postal services to rural areas, communities, and small towns where post offices are not self-sustaining.” [39 U.S.C. § 101(b)] The proposed service standard changes will significantly degrade postal services provided to rural communities, in violation of Section 101(a).

The Advance Notice states that the proposed reductions in service are necessary to “align the Postal Service’s infrastructure with current and projected mail volumes and to bring operating costs in line with revenues,” and that, “If the Postal Service were to revise service standards as described above, it could significantly improve operating efficiency and lower the operating costs of its mail processing and transportation networks.”

These objectives are not among those listed in 39 U.S.C. § 3691(b)(1). By designing service standards to meet budget goals rather than service demands, the Postal Service is violating the maxim that businesses cannot cut their way to financial health. In doing so, the proposal would degrade existing USPS products; limit the Postal Service’s ability to introduce new products, place the USPS at a distinct competitive disadvantage, and severely hamper its ability to accommodate growth. Consequently, the proposal virtually guarantees continued mail volume declines and further cutbacks in service.

For these reasons, the Postal Service should abandon the proposed changes to its mail processing and transportation networks and the service standard revisions summarized in the Advance Notice.

Respectfully submitted,

By: 
Cliff Guffey, President