

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

ANNUAL COMPLIANCE REVIEW, 2020

Docket No. ACR2020

RESPONSES OF THE UNITED STATES POSTAL SERVICE TO
QUESTIONS 1-23 OF CHAIRMAN'S INFORMATION REQUEST NO. 9

The United States Postal Service hereby provides its responses to the above-listed questions of Chairman's Information Request No. 9, issued on February 1, 2021. Each question is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Nabeel R. Cheema.
Chief Counsel, Pricing & Product Support

Eric P. Koetting

475 L'Enfant Plaza, S.W.
Washington, D.C. 20260-1137
(202) 277-6333
eric.p.koetting@usps.gov
February 8, 2021

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO CHAIRMAN'S INFORMATION REQUEST NO. 9**

1. Please identify all negotiated service agreements (NSAs) where the Postal Service did not rely on actual piece-level weight and zone data to calculate cost coverage.
 - a. For each such NSA, please identify the payment method(s) used to collect revenue under that NSA and whether the failure to collect actual piece-level weight and zone data is a technical limitation of the payment method(s) used.
 - b. For each NSA where the failure to collect actual piece-level weight and zone data is not a result of technical limitations of the payment methods used, please identify the specific contractual or operational provisions that prevented the Postal Service from collecting actual piece-level weight and zone data.

RESPONSE:

- a. Two contracts did not rely on actual piece-level weight and zone data to calculate cost coverage:

CP Docket / PMNPR ID	MC Docket / ProgReg ID	Payment Method
PMNPR-FY18- APR18-0432	1024652	Non-eVS PostalOne
PMNPR-FY19- 0614	1029475	Non-eVS PostalOne

The technical limitations of Non-eVS PostalOne do not allow storage of individual piece-level weight and zone data.

- b. Not applicable.

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO CHAIRMAN'S INFORMATION REQUEST NO. 9**

2. Please refer to Docket No. ACR2019 Response to CHIR No. 4, question 2.¹ The Postal Service stated that, “[o]nce package platform is fully deployed, we expect to have weight information on approximately 50 percent of packages.”
- a. Please provide an update on the status of the deployment of the Package Platform System.
 - b. If the Package Platform System has been fully deployed, please describe the information that was collected on packages and how this information was used for the purposes of calculating the weight and revenue for pieces entered pursuant to a NSA.

RESPONSE:

- a. Package Platform has not yet been fully deployed, and the Postal Service does not have a firm date by which Package Platform is expected to be fully deployed. Additional functionality is expected to be rolled out later this spring, with further updates planned for later this calendar year.
- b. Not applicable.

¹ Docket No. ACR2019, Responses of the United States Postal Service to Questions 1-41 of Chairman's Information Request No. 4, January 24, 2020 (Docket No. ACR2019 Response to CHIR No. 4)

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO CHAIRMAN'S INFORMATION REQUEST NO. 9**

3. In its FY 2020 Form 10-K Report, the Postal Service stated, “[w]e purchased approximately 9,500 new vehicles to add to our fleet during 2020, at a cost of approximately \$389 million.”²
- a. Please provide a summary of the types of vehicles purchased, including the quantity, cubic footage, and intended purpose associated with each type of new vehicle purchased in FY 2020.
 - b. For each type of vehicle purchased in FY 2020, please describe how the depreciation associated with these new vehicles (as opposed to the entire fleet, which is summarized in C/S 20.2 in the Cost Segments and Components report) is attributed to products. Specifically, what share is attributed to market dominant products, what share is attributed to competitive products, and what share is treated as institutional?

RESPONSE:

- a. The following table contains the vehicle type, quantity, cubic foot capacity (if applicable), and intended purpose of the 9,553 vehicles purchased in FY 2020.
- b. In the table below, the percentages reflect the variations in vehicle deployment among the different route types.

² United States Postal Regulatory Commission Form 10-K, Annual Report Pursuant to Section 13 or 15(d) of the Securities Exchange Act of 1934, November 13, 2020, at 47 (FY 2020 10-K Report).

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO CHAIRMAN'S INFORMATION REQUEST NO. 9**

Vehicle Type	Quantity	Capacity (Cubic Ft)	Intended Use	% Market Dominant	% Competitive	% Institutional
1/2T MERCEDES METRIS 20 RH	6,759	183.0	Rural Route delivery (EMA conversion) and city routes with <=20 curblines deliveries	23.95%	17.08%	58.97%
1 TON PROMASTER 2020	1,388	352.9	Mixed delivery vehicle	28.44%	6.25%	65.31%
11-TON PETERBILT CARGO VAN CBE	5	1136.7	VSD vehicle for transporting mail	25.94%	34.50%	39.56%
7-TON PETERBILT CARGO VAN CBE	3	878.3	VSD vehicle for transporting mail			
TRC SA INTERNATIONAL CBE	1,111	N/A	VSD vehicle for transporting mail hauling trailers			
TRC TA PETERBILT COE 2021 DSL	58	N/A	VSD vehicle for transporting mail hauling trailers			
EXPERIMENTAL SPOT 2019 ELEC	4	N/A	VSD vehicle for transporting mail			
OTHER MAIL HAULING TRL	14	Over 50K GVW	VSD vehicle for transporting mail			
EXPERIMENTAL	1	N/A	Test vehicle at the Vehicle Engineering department (2020 Chevrolet Bolt)	0%	0%	100%
INSP FLX	97	N/A	Inspection Service vehicles for administrative and law enforcement			
INSP LAW ENFORCE	113	N/A	Inspection Service vehicles for administrative and law enforcement			

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO CHAIRMAN'S INFORMATION REQUEST NO. 9**

4. Please provide, for each of FY 2018, FY 2019, and FY 2020, the share of competitive product volume that was delivered on each of the following route types: (a) city carrier letter routes; (b) city carrier special purpose routes; and (c) rural carrier routes. If an exact quantification is not possible, please provide the Postal Service's best estimate. Furthermore, please provide the basis for any calculations or estimates.

RESPONSE:

The best estimates for a breakout of competitive products delivered by the three carrier delivery modes are provided in the table below.

COMPETITIVE PRODUCTS			
	FY18	FY19	FY20
RCCS	38%	39%	39%
CCCS	60%	59%	59%
SPR	2%	2%	2%

This breakout excludes volumes delivered by crafts other than carriers, such as into Post Office Boxes or at the window, and also excludes deliveries on Sundays and Holidays (approximately 4 percent of competitive product volume delivered by carriers) where delivery counts are not separated by rural and city carriers.

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO CHAIRMAN'S INFORMATION REQUEST NO. 9**

5. In its Response to CHIR No. 3, the Postal Service states, “[t]he decline in unit revenue is explained by the 13 percent decline in unit weight, associated in part with the shift of mailers to the use of thinner and lighter paper for publications.”³
- a. Has the Postal Service studied whether the current piece and pound price structure is appropriate, given the current state of Periodicals? If so, please provide the report. If not, please discuss whether there are future plans to study the current structure.
 - b. Has the Postal Service considered any changes to the piece and pound price structure, given the current state of Periodicals? If so, please provide the report. If not, please discuss whether there are future plans to consider any changes to the piece and pound structure.

RESPONSE:

- a. The Postal Service has not formally studied a change in the piece and pound price structure for Periodicals. As for future plans, please see the answer to subpart b. of this question.
- b. Over the last five years, the Postal Service has made deliberate changes in its pricing strategy. In Docket No. R2015-4, the Postal Service reduced advertising and editorial pound prices to better enable customers to increase advertising revenue, expand editorial content, and increase circulation. At the same time, the Postal Service raised prices on other cost drivers, such as pieces, bundles, and containers, both to bring them closer to the incurred cost of handling and processing, and to provide incentives for efficient preparation. In rate cases since 2015, pound prices

³ Responses of the United States Postal Service to Questions 1-26 of Chairman's Information Request No. 3, question 4, January 22, 2021 (Response to CHIR No. 3).

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO CHAIRMAN'S INFORMATION REQUEST NO. 9**

were kept constant. The following table shows how the prices have changed in different categories.

	R2015	R2017	R2018	R2019	R2020
Pounds	-21.9%	0.0%	0.0%	0.0%	0.0%
Pieces	2.2%	0.8%	2.2%	1.8%	1.8%
Bundles	92.6%	0.6%	2.6%	7.7%	5.2%
Containers	48.2%	5.9%	5.4%	11.5%	3.4%

The Postal Service will continue to monitor the effect of this pricing strategy. The table below shows that the revenue derived from pounds has gone down from 23 percent to 15 percent, thereby reducing the reliance on pound revenues. This table also reflects other factors, such as the increase in prices of paper and chemicals, declining subscriptions to periodicals, and the trend towards digital copies, all of which force publishers to reduce costs by using thinner and lighter paper. Weight per-piece declined from 6.2 ounces to 5.3 ounces.

At this time, there are no plans to deviate from the current strategy. However, after the implementation of the additional authority granted in Order No. 5763, the Postal Service may reevaluate its pricing strategy.

Periodicals Outside County (Millions)

	Total Revenue	Pound Revenue	Percent	Oz/piece
FY2014	\$1,943	\$448	23.05%	6.176
FY2015	\$1,906	\$407	21.37%	6.080
FY2016	\$1,810	\$322	17.78%	6.048

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO CHAIRMAN'S INFORMATION REQUEST NO. 9**

FY2017	\$1,617	\$241	14.89%	4.896
FY2018	\$1,559	\$262	16.78%	5.744
FY2019	\$1,459	\$235	16.10%	5.584
FY2020	\$1,260	\$190	15.05%	5.328

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO CHAIRMAN'S INFORMATION REQUEST NO. 9**

6. Please refer to Library Reference USPS-FY20-33, which was filed in this docket, and Library Reference USPS-FY19-33, which was filed in Docket No. ACR2019.⁴
- a. In Library Reference USPS-FY19-33, the Postal Service states that the number of post offices at the end of FY 2019 was 26,632.⁵ In Library Reference USPS-FY20-33, the Postal Service states that the number of post offices at the beginning of FY 2020 was 26,361.⁶
 - i. Please provide the total number of post offices at the beginning of FY 2020. If this number differs from the end of FY 2019 number provided in Response to CHIR No. 1 (26,362), please explain why. In the response, please also reconcile the discrepancy between the Response to CHIR No. 1 and Library Reference USPS-FY20-33.⁷
 - ii. Please reconcile the discrepancy in the number of post offices between the two library references.⁸
 - b. In Library Reference USPS-FY19-33, the Postal Service states that the number of post offices suspended at the end of FY 2019 was 401.⁹ In Library Reference USPS-FY20-33, the Postal Service states that the number of post offices suspended at the beginning of FY 2020 was 399.¹⁰
 - i. Please provide the total number of post offices suspended at the beginning of FY 2020.

⁴ Library Reference USPS-FY20-33, December 29, 2020; Docket No. ACR2019, Library Reference USPS-FY19-33, December 27, 2019.

⁵ Library Reference USPS-FY19-33, file "PostOfficesFY2019.xlsx," tab "Post Offices," cell E35.

⁶ Library Reference USPS-FY20-33, Excel file "PostOfficesFY2020.xlsx," tab "Post Offices," cell C35.

⁷ See Responses of the United States Postal Service to Questions 1-38 of Chairman's Information Request No. 1, January 19, 2021, question 8 (Response to CHIR No. 1).

⁸ The discrepancy may result from the number of Capital Metro post offices reported at the end of FY 2019/beginning of FY 2020. Compare Library Reference USPS-FY20-33, Excel file "PostOfficesFY2020.xlsx," tab "Post Offices," cell C7 with Library Reference USPS-FY19-33, file "PostOfficesFY2019.xlsx," tab "Post Offices," cell E7.

⁹ Library Reference USPS-FY19-33, Excel file "PostOfficesFY2019.xlsx," tab "Suspension Summary," cell H26.

¹⁰ Library Reference USPS-FY20-33, Excel file "PostOfficesFY2020.xlsx," tab "Suspension Summary," cell D17.

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO CHAIRMAN'S INFORMATION REQUEST NO. 9**

- ii. Please reconcile the discrepancy in the number of suspended post offices between the two library references.¹¹

RESPONSE:

a. Number of post offices:

- i. The total number of post offices at the beginning of FY 2020 was 26,362.

This is the same number as provided in the response to CHIR No. 1, Question 8 (26,362).

- ii. In USPS-FY19-33, the Postal Service states that the number of post offices at the end of FY 2019 was 26,362.¹² The difference between the two library references is one (1) post office. This discrepancy was due to clerical error.

- b. The number of post offices suspended at the beginning of FY 2020 is 399. The difference between the FY 2019 suspended post offices number of 401 and the FY 2020 number of 399 are two (2) post offices. This difference is due to post offices that were temporarily suspended as of the end of FY 2019 due to structural damage to the facilities but reopened as of the beginning of FY 2020 and a post office that was open as of the end of FY 2019 but temporarily

¹¹ Compare Library Reference USPS-FY20-33, Excel file "PostOfficesFY2020.xlsx," tab "Suspension Summary," cell D17 with Library Reference USPS-FY19-33, Excel file "PostOfficesFY2019.xlsx," tab "Suspension Summary," cell H26.

¹² Library Reference USPS-FY19-33, file "PostOfficesFY2019.xlsx," tab "Post Offices," cell E35.

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO CHAIRMAN'S INFORMATION REQUEST NO. 9**

suspended as of the beginning of FY 2020 due to flood remediation. Specifically, three (3) post offices that appear on the end of the FY 2019 suspended list were subsequently reopened as of the beginning of FY 2020 and thus not included in the FY 2020 suspensions list; these post offices are the Virginia Post Office of East End (Capital Metro, Richmond PFC), the West Virginia Post office of Rupert (Eastern, Appalachian PFC), and the Colorado Post Office of Drake (Western, Colorado/Wyoming PFC). One post office, the Missouri Post Office of Taylor (Central Area, Gateway PFC), which had not been suspended as of the end of FY 2019, was suspended as of the beginning of FY 2020. This post office appears on the FY 2020 list, but not on the FY 2019 list.

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO CHAIRMAN'S INFORMATION REQUEST NO. 9**

7. The Postal Service provided a list of post offices suspended at the end of FY 2020 in a library reference.¹³ Please provide an updated Excel spreadsheet containing the following information for each suspended post office:
- a. City;
 - b. State;
 - c. ZIP Code;
 - d. Date Suspended;
 - e. Date Reopened (if applicable);
 - f. Suspension Reason;
 - g. Discontinuance Proposal Posting Date;
 - h. Date of Community Meeting; and
 - i. Date of Posting Final Determination to Discontinue.

RESPONSE:

Please see the electronically-attached Excel file associated with this response.

¹³ Library Reference USPS-FY20-33, Excel file "PostOfficesFY2020.xlsx," tab "Suspended End of FY20."

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO CHAIRMAN'S INFORMATION REQUEST NO. 9**

- 8.** Please refer to the Response to CHIR No. 1, question 6. Please provide Excel spreadsheets including Office Name (or other appropriate identifier), Location (City and State), and 5-Digit ZIP Code for the following:
- a. Community Post Offices (CPOs) in existence at the beginning of FY 2020;
 - b. CPOs opened during FY 2020;
 - c. CPOs closed during FY 2020; and
 - d. CPOs in existence at the end of FY 2020.

RESPONSE:

Please see the electronically-attached Excel file associated with the responses to Questions 8 through 10 of this Information Request.

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO CHAIRMAN'S INFORMATION REQUEST NO. 9**

- 9.** Please refer to Response to CHIR No. 1, question 7. Please provide Excel spreadsheets including Office Name (or other appropriate identifier), Location (City and State), and 5-Digit ZIP Code for the following:
- a. Contract Postal Units (CPUs) in existence at the beginning of FY 2020;
 - b. CPUs opened during FY 2020;
 - c. CPUs closed during FY 2020; and
 - d. CPUs in existence at the end of FY 2020.

RESPONSE:

Please see the electronically-attached Excel file associated with the responses to Questions 8 through 10 of this Information Request.

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO CHAIRMAN'S INFORMATION REQUEST NO. 9**

- 10.** Please refer to Response to CHIR No. 1, question 5. Please provide Excel spreadsheets including Office Name (or other appropriate identifier), Location (City and State), and 5-Digit ZIP Code for the following:
- a. Village Post Offices (VPOs) in existence at the beginning of FY 2020;
 - b. VPOs opened during FY 2020;
 - c. VPOs closed during FY 2020; and
 - d. VPOs in existence at the end of FY 2020.

RESPONSE:

Please see the electronically-attached Excel file associated with the responses to Questions 8 through 10 of this Information Request.

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO CHAIRMAN'S INFORMATION REQUEST NO. 9**

- 11.** In Docket No. ACR2015, the Postal Service filed two Excel spreadsheets containing data on the Collection Point Management System and corresponding density data.¹⁴ Please file an updated library reference and spreadsheets with FY 2020 data.

RESPONSE:

Please see the two electronically-attached Excel files associated with this response.

¹⁴ Docket No. ACR2015, Library Reference USPS-FY15-45, February 3, 2016, folder "ChIR.6.Q.2.CPMS," Excel files "ChIR.6.Q2a.CPMS.xlsx," and "ChIR.6.Q2b.Density Test.xlsx."

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO CHAIRMAN'S INFORMATION REQUEST NO. 9**

- 12.** At the end of FY 2020, there were 140,845 collection boxes, 1,455 fewer than in FY 2019. FY 2020 ACR at 60.
- a. Please describe the process for determining which collection boxes to remove each year. In the response, please describe all factors and criteria considered.
 - b. Please explain why the number of collection boxes decreased by 1,455 in FY 2020.

RESPONSE:

- a. The Postal Service followed the procedures specified by the Postal Operations Manual (POM). Per POM section 311 (“Residential collection boxes”): “Mail from these boxes is generally collected when mail is delivered. A 25-piece daily average is needed to justify its location.” The daily average is determined by a density testing process prescribed by POM s 314.3 (“Volume Density Tests”): “a. Use an actual count for letters or record a linear measurement of letters contained in the box. b. Convert the linear measurement to pieces at 227 pieces per foot (or current conversion figure). c. Add actual piece counts for flats and small parcels. Density tests should be for a continuous 2-week period. At a minimum, density tests must be performed annually.” Per POM section 315.3, “Collection boxes averaging less than 25 pieces a day should be relocated within the neighborhood or community to a potentially higher volume location”; however, if “after exhausting/reviewing potential relocation options, it is ultimately decided that the collection point should be removed, approval must be granted by the

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO CHAIRMAN'S INFORMATION REQUEST NO. 9**

- exception authority” of the Area Manager (as described in described in POM, Chapter 3, Section 313.33). Furthermore POM section 315.3 provides that “[b]efore a collection box can be removed or relocated, a notice to that effect for customers must be placed on the box 30 days prior to the removal or relocation showing the location(s) and collection schedule(s) for other collection points in the vicinity.” Finally, POM section 315.4 allows that “[i]f, after a collection box has been vandalized or tampered with, the location is determined to be unsecure by the Area manager, Delivery Programs Support, the box may be removed immediately without notice.”
- b. The Postal Service followed Postal Policy as specified by POM Chapter 3 by conducting an annual density test and review of the daily volumes received, and relocating or removing collection boxes for which the density volume was found to be under the required 25 pieces per day. Per POM section 313.11, the schedule and collection locations are determined by the local Postmaster. Per POM section 313.33, the Area Manager, Delivery Programs Support, must authorize all collection box removals.

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO CHAIRMAN'S INFORMATION REQUEST NO. 9**

- 13.** Please describe any plans or initiatives the Postal Service had to remove collection boxes during FY 2020. If applicable, in the response:
- a. Please explain whether the Postal Service made any changes to the FY 2020 plans or initiatives to remove collection boxes.
 - b. Please explain whether and how plans or initiatives to remove collection boxes were implemented during FY 2020.

RESPONSE:

- a. The removal of collection boxes resulted neither from a plan nor from an initiative. The Postal Service followed Postal Policy as delineated by POM, Chapter 3, conducting an annual density test and review of the daily volumes received, and relocating or removing collection boxes of which the density volume was found to be under the required 25 pieces per day.
- b. The Postal Service followed Postal Policy as specified by POM, Chapter 3.

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO CHAIRMAN'S INFORMATION REQUEST NO. 9**

- 14.** In a recent report, the Postal Service Office of Inspector General reported that 74 percent of collection boxes removed from June 15, 2020 through August 31, 2020 were from the Southern and Western areas.¹⁵
- a. Please provide the number of collection boxes removed in FY 2020 by postal area. If the total number of collection boxes removed in FY 2020 differs from information the Postal Service filed in the FY 2020 ACR, please explain why and reconcile any discrepancies.
 - b. When removing collection boxes during FY 2020, please explain whether and how any actions, plans, or initiatives focused on or significantly affected specific geographic areas or regions. If any actions, plans, or initiatives focused on or significantly affected specific geographic areas or regions, please explain why.

RESPONSE:

- a. The number of collection boxes removed in FY 2020 by postal area is below.

The total number of collection boxes removed does not differ from information the Postal Service filed in the FY 2020 ACR in USPS-FY20-33.

Area	Total Blue Collection Boxes Removed in FY20
CAPITAL METRO	40
EASTERN	117
GREAT LAKES	26
NORTHEAST	291
PACIFIC	329
SOUTHERN	294
WESTERN	358
NATIONAL	1,455

¹⁵ United States Postal Service Office of Inspector General, *Operational Changes to Mail Delivery*, Report Number 20-292-R21, October 19, 2020, at 12.

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO CHAIRMAN'S INFORMATION REQUEST NO. 9**

- b. The removal of collection boxes resulted neither from a plan nor from an initiative. The Postal Service followed Postal Policy as delineated by POM, Chapter 3, by conducting an annual density test and review of the daily volumes received, and relocating or removing collection boxes of which the density volume was found to be under the required 25 pieces per day.

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO CHAIRMAN'S INFORMATION REQUEST NO. 9**

- 15.** Please describe any plans or initiatives for removing collection boxes in FY 2021 and beyond.

RESPONSE:

The Postal Service will continue to follow the policies specified by POM, Chapter 3.

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO CHAIRMAN'S INFORMATION REQUEST NO. 9**

- 16.** If the Postal Service has plans or initiatives to remove collection boxes in FY 2021, please explain whether the Postal Service plans to request an advisory opinion from the Commission under 39 U.S.C. § 3661(b) related to collection box removals.

RESPONSE:

The Postal Service has no coordinated, top-down plans or initiatives to remove collection boxes in FY 2021 beyond the procedures specified in POM, Chapter 3. These procedures do not constitute a service change as defined by 39 U.S.C. § 3661(b). The Postal Service therefore does not plan to request an advisory opinion from the Commission related to collection box removals.

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO CHAIRMAN'S INFORMATION REQUEST NO. 9**

- 17.** Please describe all actions taken in FY 2020 to reduce hours at post offices. In the response, please provide the number of post offices with hours reduced in FY 2020 disaggregated by postal area.

RESPONSE:

In FY2020, the Postal Service did not implement a national initiative to reduce hours at post offices. At the Area level and on an as-needed basis, hours are adjusted based on customer traffic patterns and on the needs of the Postal Service.

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO CHAIRMAN'S INFORMATION REQUEST NO. 9**

- 18.** Please describe any plans or initiatives the Postal Service had for reducing hours at post offices in FY 2020. If applicable, in the response:
- a. Please explain whether the Postal Service made any changes in FY 2020 to these plans or initiatives for reducing hours at post offices in FY 2020.
 - b. Please explain whether and how plans or initiatives to reduce hours at post offices were implemented during FY 2020.

RESPONSE:

In FY2020, nationally, the Postal Service did not execute any plans or initiatives to reduce hours at post offices.

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO CHAIRMAN'S INFORMATION REQUEST NO. 9**

- 19.** Please explain whether and how any actions, plans, or initiatives for reducing hours at post offices during FY 2020 focused on or significantly affected specific geographic areas or regions. If any actions, plans, or initiatives focused on or significantly affected specific geographic areas or regions, please explain why.

RESPONSE:

In FY2020, the Postal Service did not execute plans, or implement a national initiative, to reduce hours at post offices.

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO CHAIRMAN'S INFORMATION REQUEST NO. 9**

- 20.** Please describe any plans or initiatives for reducing hours at post offices in FY 2021 and beyond.

RESPONSE:

The Postal Service is currently examining plans for review of its retail services. The Postal Service will communicate all plans to all stakeholders at the appropriate time.

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO CHAIRMAN'S INFORMATION REQUEST NO. 9**

- 21.** If the Postal Service has plans or initiatives to reduce hours at post offices in FY 2021, please explain whether the Postal Service plans to request an advisory opinion from the Commission under 39 U.S.C. § 3661(b) related to reduced post office hours.

RESPONSE:

To the extent that Postal Service management determines that any of its plans would require advance review by the Commission under 39 U.S.C. 3661, it would first present those plans to the Board of Governors, which determines whether the Postal Service will seek an advisory opinion from the Commission. See 39 CFR 3.3. At this stage, it is premature to determine which proposals will be endorsed by the Board, and whether any such proposals will require advance review by the Commission under section 3661.

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO CHAIRMAN'S INFORMATION REQUEST NO. 9**

22. Please see Attachment, filed under seal.

RESPONSE:

Please see the response filed under seal as part of USPS-FY20-NP39.

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO CHAIRMAN'S INFORMATION REQUEST NO. 9**

23. Please see Attachment, filed under seal.

RESPONSE:

Please see the response filed under seal as part of USPS-FY20-NP39.