

A Stunning Admission:

USPS Hasn't Considered Combined Effect of Proposed Changes

In response to a motion filed by the APWU, the Postal Service admitted March 9 that it has not considered the combined effect of several of its major proposals, including plans to:

- Degrade service standards; end overnight delivery for first-class mail and periodicals, and slow mail delivery in general;
- Consolidate more than 220 mail processing facilities;
- Close 3,600 post offices;
- Eliminate Saturday mail delivery, and
- Raise postage rates.

In a document filed with the Postal Regulatory Commission (PRC), the Postal Service declared that it “has conducted no ‘combined impact’ analysis” of the proposals. The USPS filed the document in response to an APWU motion that sought to compel the Postal Service to provide testimony about how it weighed the cumulative effect of the pending changes.

The APWU motion to the PRC asserted that the combined effect of the changes will be greater than the sum of their parts. Together they will de-value postal products, undermine customer loyalty, reduce demand for postal services, and increase USPS financial problems.

‘Gross Negligence’

APWU President Cliff Guffey expressed shock and outrage at the USPS admission. “This is gross negligence,” he said. “The PRC – and Congress – should demand an explanation from postal management about why such a vital analysis has not been done.

“Congress must act now to stop the Postal Service from implementing massive service cuts that will delay mail, kill jobs, and hurt the economy.”

“I encourage locals facing consolidations and closures to make sure their legislators are aware of the Postal

Service’s outrageous failure to consider the combined effects of USPS plans to impose drastic cuts in service,” Guffey said.

Relevant to PRC Proceedings

In its March 2 motion, the APWU said the combined impact is relevant to the PRC’s evaluation of the Postal Service’s proposal to degrade service standards. The commission is currently considering the proposal, which would eliminate overnight delivery, extend two-day delivery to three days, and generally delay mail delivery.

The union provided a hypothetical example: Assume a first-class letter is mailed on a Thursday to a destination with an overnight service standard. If no changes are made to the present processing network or service standards, the letter would arrive at its destination on Friday, the next day. If overnight delivery is eliminated, the letter may not arrive until Saturday, two days later. If Saturday delivery is eliminated as well, then the letter would not arrive until Monday, four days later, at the earliest. “In this simple example, the combined influence of the two initiatives would create a larger negative impact on service than either initiative would cause in isolation,” the union wrote.

The USPS reply reveals that in 2011, “the Postal Service initiated – but abandoned without completing – a market research project intended to evaluate customer response, thus impacts upon volume” of “a grand amalgam of service change concepts and financial challenges.”

The PRC is expected to issue a non-binding advisory opinion in August, but a moratorium on the consolidation of 223 mail processing centers and the closure of 3,600 post offices expires on May 15. The moratorium is intended to give Congress time to address the USPS crisis without drastic cuts in service or the elimination of tens of thousands of jobs.

For more information, visit www.apwu.org.