



U.S. POSTAL REGULATORY COMMISSION
Washington, DC 20268-0001

Office of the General Counsel

December 8, 2014

Louis M. Atkins, President
National Association of Postal Supervisors
1727 King Street, Ste. 400
Alexandria, VA 22314-2753

Dear Mr. Atkins:

Thank you for bringing the National Association of Postal Supervisors' (NAPS) concerns regarding the Postal Service's plan to consolidate 82 mail processing facilities to the attention of the Commission. As you note in your letter, the Commission previously addressed this issue in Docket No. N2012-1, Advisory Opinion on Mail Processing Network Rationalization Service Changes, September 28, 2012 (Advisory Opinion). NAPS asks the Commission to reopen Docket No. N2012-1, or initiate a new public inquiry or other proceeding, to reassess Phase II of the Postal Service's network rationalization initiative that is planned to begin in January of 2015.

Generally, the Postal Service must seek an advisory opinion whenever it "determines that there should be a change in the nature of postal services which will generally affect service on a nationwide or substantially nationwide bases." See 39 U.S.C. § 3661. There is not a direct mechanism for the Commission to independently initiate the advisory opinion process, or reopen a completed advisory opinion docket. Advisory opinions issued by the Commission provide an independent assessment of proposed Postal Service actions and they are advisory in nature, which means that the Postal Service is not bound by the advice or recommendations provided therein.

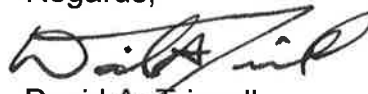
The Commission may engage the Postal Service concerning whether or not an action that it is undertaking (or plans to undertake) necessitates the filing of a new request for an advisory opinion, however, the Commission is not aware of any material deviations from the plan previously presented that would require such Commission involvement.

In Docket No. N2012-1, the Commission recognized that network rationalization increases the days to delivery for certain types of mail. Network rationalization's impact on the ability to meet service performance goals (given the increased days to delivery) is a related issue.

The Postal Service reports its progress in meeting service performance goals on a quarterly basis for informational purposes, and on an annual basis for compliance purposes. For compliance purposes, the Postal Service reports its network service performance at a national level by each market dominant product. The annual results are reported and discussed in the Commission's Annual Compliance Determination (ACD). The ACD reviews service performance at the national level, and is not intended to provide review at a local or facility level. NAPS has the opportunity to participate in the ACD process by submitting comments concerning annual service performance.

Based on all of the considerations above, the Commission does not have a basis for initiating a reassessment of Phase II of the Postal Service's network rationalization initiative at this time. However, NAPS is encouraged to participate in the ACD process if it believes that the Postal Service's service performance goals are not being met.

Regards,



David A. Trissell
General Counsel

cc: Acting Chairman Robert G. Taub
Vice Chairman Mark Acton
Commissioner Ruth Goldway