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December 31, 2024

The Honorable Louis DeJoy
Postmaster General
United States Postal Service
475 L'Enfant Plaza SW,
Washington, DC 20260

Re: "Service Standards for Market-Dominant Mail Products" Proposed Rule Comment Letter

Dear Postmaster General DeJoy,

On November 15th, 2024, the United States Postal Service (USPS) issued a proposed rule to amend its service standards for market-dominant products to align them with the newly proposed Regional Transportation Optimization (RTO) strategy, among other initiatives outlined within the 10-year Delivering for America (DFA) Plan.¹ As stated in previous correspondence, while I understand the USPS must evolve in order to keep up with changing times and market conditions, the negative consequences of these proposed actions and plans will be felt far and wide in rural America, particularly in communities across Wyoming.

According to the information provided by USPS, the proposed RTO strategy and subsequent service standard revisions outlined in the proposed rule purportedly seek to cut down on transportation costs by eliminating afternoon collections at post offices over 50 miles away from the newly proposed regional processing and distribution centers (RP&DC).² Such revisions will inevitably force mail to sit overnight and await collection the next day, assuming it is not Sunday or a Federal holiday, which would no longer be considered transit days under this proposal. In other words, this change alone adds at least one extra day to the overall delivery timeline.

Given that most post offices outside the 50-mile boundary are in rural communities, these areas will disproportionately see their service downgraded. Most regrettably, however, and in the case of my home state of Wyoming, along with that of South Dakota and Vermont, not one community will fall within the designated 50-mile radius, thereby subjecting these states to the negative consequences of the RTO without any upside.³

¹ <https://www.federalregister.gov/documents/2024/11/15/2024-26434/service-standards-for-market-dominant-mail-products#:~:text=The%20United%20States%20Postal%20Service,has%20multiple%2C%20redundant%20network%20flows.>

² <https://www.washingtonpost.com/business/2024/08/22/usps-mail-slowdown-election/>

³ <https://www.savethepostoffice.com/postal-service-slows-down-the-mail-again/>

While the USPS has made continuous assurances that any downgrades will be contained within the existing 1–5-day service range, numerous RTO-impacted communities will nevertheless receive downgraded service. According to statistics provided by USPS, approximately 11% of all First-Class Mail and 39% of Single-Piece First-Class Mail will be negatively affected. In its initial filing for an advisory opinion, the USPS acknowledges that it fully recognizes that a portion of end-to-end volume across products will experience a service standard downgrade but that the predicted benefits outweigh these impacts.⁴ This is entirely unacceptable, and it is also important to note that, as pointed out by the Postal Regulatory Commission’s (PRC) Public Representative, the projected efficiencies and cost savings may not be accurately represented and could, therefore, be unreliable.⁵ Imposing one-size-fits-all reforms on a scale of this magnitude without a solid and verifiable understanding of the efficiencies and consequences, including whether the benefits outweigh the costs, is completely unfounded and unacceptable.

On that note, it must also be emphasized that this overarching plan still contains multiple irregularities and uncertainties that have yet to be explained, leaving one to theorize that USPS is pursuing these changes on the fly rather than in a coordinated and assessed manner. In just one example, since the completion of the mail processing facility reviews (MPFR), which, in almost all cases, supported consolidation, the USPS has appeared to backtrack by stating that certain facilities will continue to retain local turnaround mail.⁶ The means of classification as to which existing facilities will retain local turnaround mail, a complete list of such facilities, and whether the surrounding post offices will be subject to RTO and lose afternoon collections are just a few of the many factors that have not been properly communicated by USPS despite releasing its proposed rule.

Furthermore, as stressed repeatedly, locations previously subjected to the Local Transportation Optimization (LTO) strategy and the opening of new RP&DCs have been plagued with challenges. One can simply look no further than the findings from multiple Office of Inspector General (OIG) reports for Richmond, VA, Atlanta, GA, and Houston, TX. The OIG report for the Richmond RP&DC found that USPS was faced with millions in unexpected labor and transportation costs and an overall decrease in service performance for the Richmond region.⁷ Similarly, in Atlanta, the OIG found that the challenges caused an “immediate and significant decline in service performance in the Atlanta region.”⁸ Most recently, an OIG report entitled “Network Changes: Local Transportation Optimization” found that the LTO initiatives negatively impacted service to customers, *particularly rural populations*, and “overall transportation expenditures increased by \$7.13 million for the 15 LTO implemented regions when compared to the same period last year.”⁹ The report also concluded that the USPS failed to adequately inform its customers and the general public about LTO changes and their impact on mail delivery, which appears to be a consistent theme as the USPS has advanced the DFA Plan. These findings reinforce our worst fears—that the costs far outweigh the benefits of these so-called reforms, and rural areas, such as the entire state of Wyoming, suffer the most.

⁴ <https://prc.arkcase.com/api/prc-dockets/filing/downloadFile?fileId=209306&inline=true>

⁵ <https://prc.arkcase.com/api/prc-dockets/filing/downloadFile?fileId=231995&inline=true>

⁶ <https://www.savethepostoffice.com/more-lpcs-will-keep-local-mail-operations-where-why-and-other-mysteries-of-the-dfa/>

⁷ <https://www.uspsoig.gov/sites/default/files/reports/2024-04/23-161-r24.pdf>

⁸ <https://www.uspsoig.gov/sites/default/files/reports/2024-08/24-074-r24.pdf>

⁹ <https://www.uspsoig.gov/sites/default/files/reports/2024-12/24-142-r25.pdf>

Lastly, the USPS' own decision to lower its performance targets for FY25 after consistently failing to meet its FY24 metrics is worrisome as it appears that the USPS is anticipating worsening service in the coming year once it resumes the rollout of these changes.¹⁰ Notably, the new performance targets of 87% and 80% on-time delivery for two-day and three-five-day first-class mail, respectively, are some of the lowest targets since the pandemic disrupted mail services nationwide.

These changes are further predicated upon and being pursued in tandem with the USPS' restructuring of its processing and delivery network, which, in the case of Wyoming, will see both of its existing P&DCs in Cheyenne, and Casper downgraded and the bulk of their operations consolidated to Denver and Billings, respectively. Under these combined objectives, Wyoming's mail will not only have to sit an additional day to await collection but will then have to be trucked hundreds of miles to the newly planned out-of-state RP&DCs. This is also assuming the best-case scenario, which does not take into account instances of hazardous weather and widespread road closures, common occurrences in Wyoming. While these changes might benefit Denver's mail, I fail to see how the state of Wyoming stands to gain anything aside from degraded service.

This is especially worrisome when it comes to such things as the delivery of medications to our veterans and mail-in ballots for elections. This latter concern was borne out in Utah earlier this year, with voters in the southern part of the state being disenfranchised when their ballots were trucked to Nevada for processing but not timely returned for counting in the primary election.¹¹ Such a situation is not only unacceptable but could open the USPS to lawsuits from anyone so affected.

Members of Congress, state and local officials, industry stakeholders, postal workers, and the American public, particularly in Wyoming and other less populated states, are strongly opposed to any attempts to disenfranchise rural communities for the sake of cutting costs, which is exactly what the RTO and service standard revisions outlined within this proposed rule seek to accomplish. Many of us have raised these concerns with the USPS for well over a year, yet there does not seem to be any effort to address or resolve these matters. With all of these concerns in mind and for the sake of our rural communities and individuals whose livelihoods and physical well-being depend on a reliable postal service, I strongly urge the USPS to rescind this proposed rule and reevaluate the impact these changes will inevitably have on millions of Americans.

Sincerely,



Harriet M. Hageman
Member of Congress

¹⁰ <https://prc.arkcase.com/api/prc-dockets/filing/downloadFile?fileId=226865&inline=true>

¹¹ <https://www.npr.org/transcripts/nx-s1-5111883>