



June 22, 2021

Manager, Public Classification
U.S. Postal Service
475 L'Enfant Plaza SW, Room 4446
Washington, DC 20260-3436

RE: "Service Standards for Market-Dominant Mail Product"; Docket Number 2021-08463; FR
Notice Pages 21675-21680

On behalf of the nearly 200,000 family farmer, rancher, and rural members of National Farmers Union (NFU), thank you for the opportunity to submit comments regarding proposed revisions to the service standards for market-dominant mail products.

During the 2021 NFU Annual Convention, Farmers Union member-delegates approved a special order of business entitled, "Family Farming and Moving Forward from COVID-19," which listed the changes necessary to enact "lasting, positive change in our nation's farm, food, education, communication, and healthcare systems."¹ Among the steps included in the document was a call to "support the United States Postal Service and ensure prompt delivery and affordable rates in all parts of the country, including rural areas."

The ongoing COVID-19 pandemic continues causing many disruptions to the U.S. Postal Service (USPS). The U.S. postal management's proposal to permanently slow-down their "service standards" applicable to certain First-Class Mail with respect to delivery day ranges would be catastrophic for many farmers, especially those who rely on the USPS to send live animals and those who are struggling to stay afloat financially. First-Class mail is supposed to be delivered within 1-3 days, the new proposed rules would expand this day range to 5 days for both First-Class and periodicals daily. Rural communities rely on the USPS for far more than paper mail and in many cases a longer delivery time would put many of their businesses and livelihoods at risk.

Farmers rely on quick and affordable delivery for more than just seeds, fertilizer, pesticides, and other essential products. Farmers also receive live animals like chicks and bees in the mail. In

¹ National Farmers Union. "2021 Policy of the National Farmers Union." March 1, 2021. <https://nfu.org/policy/>

these cases, delivery times cannot risk being postponed without tragic results. For example, beekeeping operations solely depend on the USPS to maintain their businesses. Pollination season requires the continuation of on time, and in many cases overnight mail delivery of colonies and supplies. These same farmers also send honey to customers, which requires quick delivery. Where priority mail is not an option, First-Class mail has always been a quick and affordable option for many farmers.²

Since even before the pandemic, many rural farmers have been facing problems getting access to inputs and tools that are usually found at community stores. Many rural areas are not covered by private carriers and farmers cannot just simply drive to their nearest store to make a purchase. Many farmers cannot take hours to drive to a location for materials, especially during harvest season. In situations like these, USPS is the most reliable source for receiving packages. A 5-day delivery time would be very disruptive for rural farming operations who solely depend on USPS for quick and reliable delivery.³

The pandemic has moved schooling, business operations, and overall communication online. However, for many rural communities without access to broadband internet, the USPS continues to be their most reliable source. The Federal Communications Commission's latest estimates (released on Jan. 19, 2021) that 14.5 million people don't have broadband—and experts believe the actual number is twice that or more.⁴ Considering that figure, that translates to 14.5 million people who rely on the USPS as their primary means of connectivity other than a phone.

Lastly, rural Americans depend on the USPS for more than day-to-day communication and business delivery—they also receive medication via mail. Between 2013 and 2018, 16 percent of independent rural pharmacies went out of business, leaving 630 communities with no pharmacy at all.⁵ Private services like the UPS or FedEx often do not even provide delivery to certain rural areas and, when they do, many rural residents must pay high delivery rates. The USPS's decision to extend First-Class mail delivery times will not only be very detrimental to rural America, but also to those who cannot afford other delivery options.

² Larew, Rob. "Commentary: We Need a Strong Postal Service after the Election, Too." *The Daily Yonder*, 20 Aug. 2020, dailyyonder.com/commentary-we-need-a-strong-postal-service-after-the-election-too/2020/08/20/.

³ Ibid.

⁴ Acp. "American Connection Project." *ACP - Home*, www.americanconnectionproject.com/.

⁵ "Rural Pharmacies Are Closing: Where Does That Leave Patients? | Patient Advice | US News." *U.S. News & World Report*, U.S. News & World Report, [health.usnews.com/health-care/patient-advice/articles/2018-10-17/rural-pharmacies-are-closing-where-does-that-leave-patients](https://www.usnews.com/health-care/patient-advice/articles/2018-10-17/rural-pharmacies-are-closing-where-does-that-leave-patients).

For the reasons listed above, NFU is opposed to the proposed service standard changes which would permanently slow down the delivery of much of our mail. The USPS 's focus should be on improving the delays of service in the past year, not making these delays permanent.

Thank you for the opportunity to submit these comments. Please contact Layla Soberanis, NFU Senior Government Relations Representative, at Lsoberanis@nfudc.org should you have any questions. Thank you for your consideration.

Sincerely,

Rob Larew
President