

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

Periodic Reporting of Service Performance)
Measurements and Customer Satisfaction)

Docket No. RM2009-11

**VALPAK DIRECT MARKETING SYSTEMS, INC. AND
VALPAK DEALERS' ASSOCIATION, INC.
INITIAL COMMENTS ON PROPOSED RULEMAKING ON
PERIODIC REPORTING
(November 2, 2009)**

INTRODUCTION

On September 2, 2009, the Commission issued Order No. 292, Notice of Proposed Rulemaking on Periodic Reporting of Service Performance Measurements and Customer Satisfaction, commencing Docket No. RM2009-11. The deadline for initial comments is November 2, 2009, and the deadline for reply comments is December 1, 2009. *See* Order No. 292, 74 *Fed. Reg.* 49,190 (Sept. 25, 2009), as modified by Order No. 320 (Oct. 21, 2009).

Valpak Direct Marketing Systems, Inc. and Valpak Dealers' Association, Inc. (hereafter "Valpak") submit these joint reply comments in response to Order No. 292.

PROCEDURAL BACKGROUND

The Postal Accountability and Enhancement Act (Pub. L. 109-435) ("PAEA") requires that the Postal Service report to the Commission no later than 90 days after the end of the fiscal year, which report:

shall, for each market-dominant product provided in such year, provide—

* * *

(B) measures of the **quality of service** afforded by the Postal Service in connection with such product, including—

- (i) the level of service (described in terms of **speed of delivery and reliability**) provided; and
- (ii) the degree of **customer satisfaction** with the service provided. [39 U.S.C. § 3652(a)(2) (emphasis added).]

In Docket No. RM2008-4, the Commission implemented regulations concerning the format and content of the Postal Service's annual report required by section 3652, but deferred the development of rules specific to reporting of service performance measurement until a later time. *See* Order No. 203 (Apr. 16, 2009), p. 49. The Postal Service previously proposed formats for reporting service performance measurement in its request for the Commission to approve its internal service performance measurement systems pursuant to 39 U.S.C. section 3691(b)(2), and in Docket No. PI2008-1, the Commission provided for a period of public comment on the Postal Service's proposals, although the reporting formats were not being decided in that docket. *See* Order Nos. 48, 83, and 140.

Now, in Order No. 292, the Commission proposes regulations for the Postal Service's reporting of service performance measurement of market dominant products and "the degree of customer satisfaction" (39 U.S.C. § 3652(a)(2)(B)(ii)), as well as other reporting not specifically required by PAEA.

COMMENTS

I. Separate Measurement and Reporting by Standard Mail Product and Shape

PAEA requires the Postal Service to "provide a system of ... performance measurements for **each market-dominant product....**" 39 U.S.C. § 3691(b)(1)(D) (emphasis added).

In Docket No. PI2008-1, the Postal Service initially proposed reporting service performance for **saturation letters** and **carrier route flats** combined within the same category. See attachment to Commission Order No. 48 (Dec. 4, 2007), “USPS *Service Performance Measurement*, November 2007,” pp. 36-38. The rationale was that both types of mail are primarily DSCF- or DDU-entered and they share “distinct characteristics.” Valpak opposed the combined reporting of letters and flats. Valpak Initial Comments (Jan. 18, 2008), pp. 3-4. The Postal Service’s revised proposal continued to group **saturation letters** and **saturation flats**. See attachment to Commission Order No. 83, “Postal Service Revised Service Performance Measurement Plan,” p. 29 (June 18, 2008). Again, Valpak opposed combining letters and flats. Valpak Comments in Response to Order No. 83 (July 9, 2008), pp. 5-7.

In the present docket, the Commission’s proposed reporting format requires data based on the market dominant product list as set forth in Order No. 292, Table VII-1, pp. 35-38. The Commission explains that this is consistent with the requirement that “level of service ... provided” and “degree of customer satisfaction” be reported “for **each market-dominant product** provided in such year” (39 U.S.C. § 3652(a)(2) (emphasis added)). “This rulemaking proposes reporting requirements by product as urged [by commenters in Docket No. PI2008-1], which also is consistent with the Commission’s interpretation of the statutory requirements of section 3652(a)(2).” Order No. 292, p. 8. As a result, the Commission proposes combined reporting for Saturation and High Density Letters. Since this combined reporting is based on separate reporting for each existing product, Valpak agrees with the Commission’s approach.

Valpak would note that in addition to consistency with 39 U.S.C. § 3652(a)(2), the Commission’s approach is also consistent with the objective of the modern service standards to

provide for a system of “performance measurements for **each market-dominant product** as a basis for measurement of Postal Service performance” under 39 U.S.C. section 3691(b)(1)(D) (emphasis added).

Lastly, the Commission noted that Valpak and several other mailers had requested “some form of shape-based reporting.” Order No. 292, p. 9. It concluded, “Although the Commission is not opposed to consideration of shape-based reporting if the need can be demonstrated at some future date, the rules proposed in this rulemaking do not reflect shape-based reporting, *per se*. However, ... significant, although imperfect, shape-based reporting will be accomplished.” *Id.* Again, Valpak agrees. At some future time, reporting for Standard Mail products containing multiple-shaped mailpieces should be revisited to determine whether the Commission and the public would be better informed if performance reporting for those products were disaggregated by shape.

II. Clarification of Categorization of Standard Mail Reporting

As the Postal Service proposed, the Commission’s proposed **quarterly** reporting format disaggregates Standard Mail products (i) by Destination Entry and (ii) End-to-End mail. The Commission then further disaggregates both categories, as follows.

- **Destination Entry** mail distinguishes mail subject to:
 - (i) **2-day through 4-day** service standards; and
 - (ii) **5-day through 10-day** service standards.

- **End-to-End** mail distinguishes mail subject to:
 - (i) **3-day through 5-day** service standards; and

(ii) **6-day through 22-day** service standards.¹

By way of explaining the divisions within destination entry mail, the Commission states:

Destination Entry **2-day through 4-day** service standard mail roughly coincides with **DDU and DSCF** entered mail.

Destination Entry **5-day through 10-day** service standard mail roughly coincides with **DBMC and BMC** entered mail. [Order No. 292, p. 21, n.21 (emphasis added).²]

A. On-Time Reporting of Mail with Various Service Standards Must Not Include Late Mail.

Valpak questions whether these rules inadvertently could result in the erroneous reporting of late-delivered mail as timely-delivered. For example, assuming mail is entered timely, before the Critical Entry Time, the day of entry is day 0 (zero). DSCF-entered saturation letters for delivery within the contiguous states have a service standard of three days. Thus, if delivered on day 1, 2, or 3, such letters are delivered timely. However, if such a letter arrives on day 4, delivery was not timely, and should not be reported as on-time merely because it falls within the range of “2-day through 4-day.” Such a piece would be one day late

¹ The proposed regulation states:

For each product within the Standard Mail class, report the on-time service performance (as a percentage rounded to one decimal place), disaggregated by the Destination Entry (2-day through 4-day), Destination Entry (5-day through 10-day), End-to-End (3-day through 5-day), and End-to-End (6-day through 22-day) entry mail/service standards, provided at the District, Postal Administrative Area, and National levels. [Order No. 292, Proposed section 3055.50(a).]

² “BMC entered mail” appears to be limited to mail dropped at a BMC in the 48 contiguous states but that destinatees in Alaska, Hawaii, Guam, Puerto Rico, or the U.S. Virgin Islands. If otherwise, use of this term in conjunction with destination-entered mail should be clarified.

and should be included only in the variance report.³ Although one could assume that the Postal Service would report such pieces properly, it would appear wise for the Commission to clarify these rules to avoid any misunderstanding. Obviously, only mail that is delivered “on time,” however aggregated by service standard, should be reported in the “on time” column.

B. Destination Entry Standard Mail Disaggregation Should Better Reflect Point of Entry.

DSCF-entered mail with a 4-day service standard applies only to mail entered before the Critical Entry Time in San Juan, Puerto Rico and destined for the U.S. Virgin Islands, and thus constitutes only a minute portion of all Standard Mail (and perhaps no portion whatsoever of High Density/Saturation mail). To better implement the Commission’s goal of “roughly coincide” with the point of entry, reporting of 2-day through 4-day could be divided to roughly coincide with DDU- or DSCF-entered mail. For example, to make destination-entered mail data more meaningful, the format could be revised into one of the following formats — Option A being that which would be preferred as providing more useful information. If Option A were for some reason impossible, or too expensive to develop, an Option B is provided below.

Option A would add a column and is consistent with the Commission’s division based on point of entry:

1. mail with a **2-day** service standard (roughly reflecting DDU-entered mail),
2. mail with a **3-day/4-day** service standard (roughly reflecting DSCF-entered mail), and
3. mail with a **5-day through 10-day** service standard (roughly reflecting DBMC- and BMC-entered mail).

³ Proposed rule 3055.50(b) appears to be clear that the variance report should include mail delivered within one through three days after the “applicable service standard.”

Option B would better identify DDU/DSCF mail by moving mail with a 4-day service standard to the DBMC column:

1. mail with a **2-day/3-day** service standard (reflecting all DDU-entered mail, and over 99 percent of all DSCF-entered mail),
2. mail with a **4-day through 10-day** service standard (reflecting DBMC and remote-destinating mail entered at the appropriate BMC mail, plus any DSCF Virgin Island mail).

III. Need for Commission to Revisit Regulations after Round of Data Collection and Reporting

At the conclusion of Docket No. PI2008-1, the Commission accurately described the ongoing nature of service performance measurement, stating, “The task is complex and will require continuing effort.... Continuing attention is necessary to keep the implementation of the measurement systems on track.” Order No. 140, p. 47 (Nov. 25, 2008).

Similarly, in this docket, the Commission pointed out:

The Commission’s authority is continuing as it has further authority to initiate proceedings to improve the quality, accuracy and completeness of data whenever it shall appear that “the quality of service data has become significantly inaccurate or can be significantly improved.” 39 U.S.C. 3652(e)(2)(B). [Order No. 292, p. 6, n. 8.]

Several times when the Commission addressed certain performance data issues in this docket, it suggested that it could revisit them again in the future.

Just as the Postal Service’s development of the service performance measurement systems is a continuing process, the Commission’s regulations regarding reporting is not ended by final rules in this docket. Once implemented, the early reports submitted under these rules could inform on the various strengths and weaknesses of not only the Postal Service’s

performance, but also the Postal Service's measurement systems and the Commission reporting rules.

As the Postal Service's performance measurement systems begin to deliver more data at reduced cost, the Commission may find areas to improve or enhance the reporting requirements. For example, as more mailers implement the Intelligent Mail Barcode ("IMB"), more performance data will be available to the Postal Service, particularly in the area of processing. The Commission may find that it would like to review all available data for mail processing because under current rules only a portion of those data would be reported — namely, those pieces recorded by reporters showing the full time of delivery. Such information would have much more volume, and therefore could be more representative of problems in certain areas of processing.

Other areas that could be considered at a later date, after some experience under finalized rules, are shape-based data, reporting on satisfaction of **commercial** (not just retail) customers, and improved reporting on "tail of the mail."⁴

IV. Need for Clear Annual Reporting of Changes in Speed of Delivery

Order No. 292 states that:

The Postal Service proposes in its Plan and the Commission adopts for this rulemaking a **two level system** for

⁴ The Commission recognized that various mailers requested expanded reporting on tail of the mail, but was "not convinced that additional reporting was justified." Order No. 292, p. 9, n. 12. Previously, in Docket No. PI2008-1, the Commission noted that "[t]his area is subject to re-evaluation once the measurement systems begin generating actual data and specific problems are identified." Order No. 140, p. 44.

reporting service performance consisting of an **Annual Report** provided at a **high level of aggregation** and four **Quarterly Reports** which provide information at a more **detailed** level. [Order No. 292, p. 8 (emphasis added).]

Under the **annual reporting** format for the “High Density and Saturation Letters” product (illustrated in Order No. 292, Table VII-2 at p. 39), the Postal Service would show the:

- (i) “**Target**” for on-time performance, and
- (ii) “**% On-Time.**”

First, the regulations should specify with more precision what the “Target” Column then would show — *e.g.*, service goal, not service standard.

Second, it appears that for the latter item, “% On-Time,” the Postal Service would report a **single percentage** for High Density and Saturation Letters rounded to one decimal place, regardless of the service standard applicable to each piece in the mix (which service standard generally depends on where the mail is entered). *See* proposed rule 3055.21. If this is not what was intended by the Commission, some clarification in the reporting form should be made.

Clearly, such a proposed **annual report** for on-time performance would be at a high level of aggregation — perhaps too high. However, it will enable summary comparisons of on-time performance for the six Standard Mail products and at least would be consistent with the statutory requirement. Later, should a need arise for more detail in annual reporting — *e.g.*, separate display of on-time performance for destination and origin entered mail — that could be developed using more detailed quarterly data.

Regardless of how highly aggregated the annual reporting is at the outset, the Commission should require that it be presented in a manner that facilitates year-to-year analysis. That is, after the first year the Commission should require the Postal Service to provide the comparable “% **On-Time**” figure from the prior fiscal year, and the change in “% **On-Time**” from year to year, as follows:

% On-Time (last year)	% On-Time (current year)	% On-Time (% change)
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The proposed report for on-time performance of Standard Mail is consistent with the traditional format for reporting service performance for First-Class Mail under the X-FC system. On-time performance can be regarded as a proxy for speed of delivery. That is, a change in on-time performance would tend to reflect a corresponding change in average speed of delivery. Other factors, though, such as delay of mail not delivered timely could offset a change in on-time performance. By itself, on-time performance does not necessarily reflect speed of delivery for all mail within a product. Hence reporting of on-time performance needs to be accompanied by a report on reliability, or variance (*see* section V, *infra*).

V. Improved Reporting of Reliability (Variance)

Both 39 U.S.C. section 3652(a)(2) and Order No. 292 identify (i) speed of delivery, and (ii) reliability, as distinct concepts, suggesting that no single statistical measure could satisfactorily encompass both.⁵ “Speed of Delivery” is discussed in Section IV, *infra*.

⁵ In the unusual circumstance where 100 percent of all volume within a product was delivered on the target delivery day, a single statistical measure perhaps could encompass
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“Reliability” reflects the extent to which mail delivery differs from the established target (*i.e.*, service standard). Most often, the aspect of reliability of greatest concern to mailers is with mail not delivered by the target date (under the applicable service standard) and the additional length of time required for delivery of all pieces — *i.e.*, that portion commonly referred to as the “tail of the mail.”⁶

For **destination-entered** (such as High Density and Saturation) Standard Mail, the service standard ranges from 2 to 10 days. When such mail is entered at DSCFs, the service standard calls for delivery within 3 days.⁷ The tail of the mail for such destination-entered mail should be small, and easily captured in the quarterly variance reports illustrated in Table VII-3. Moreover, no issue of “early” delivery arises with respect to destination-entered mail (see below).

For **origin-entered** Standard Mail, the service standard can range up to 22 days (*see* Order No. 292, Table IV-1 at p. 11), because some delay is permitted at several intermediate processing points. By no means, though, does origin-entered mail always encounter the maximum permitted delay that is incorporated in the service standard. Consequently, when the

⁵(...continued)
satisfactorily both speed of delivery and reliability.

⁶ In Docket No. PI2008-1, Order No. 140, the Commission “recognize[d] the benefits to mailers of more detailed reporting of delivery variance and consistency,” but concluded that variance reporting “is subject to re-evaluation once the measurement systems begin generating actual data and specific problems are identified.” (P. 44.) In Order No. 292, with respect to “tail-of-the-mail,” the Commission stated it “is not convinced that additional reporting was justified.” Order No. 292, p. 9 n.12.

⁷ Those (presumably few) pieces dropped at the San Juan SCF prior to Critical Entry Time and which are destined for the U.S. Virgin Islands have a 4-day service standard.

service standard can range up to 22 days, ample opportunity for unexpectedly early delivery also exists. For some advertisers, having their mail delivered too early could present both an unexpected and unpleasant surprise. Reliability can cut both ways, *i.e.*, it pertains to delivery that is not only late, but also unexpectedly early. Ideally, the performance measurement system and the reliability measure would capture and report such deviations.

Advertisers generally plan their mailings well in advance, and can enter their mail whenever necessary to achieve desired delivery. For them, reliability is more important than speed of delivery.⁸ Many advertising mailers have their own method of determining when their mail actually is delivered. If a mailer's experience indicates that delivery can deviate from the service standard by, say, -5 to +5 days, reliability is far worse than it would be if experience indicates a deviation from the service standard of, say, -1 to +1 days.

A. Improving the Quarterly Variance Reporting.

For the product "High Density and Saturation Letters," Order No. 292 illustrates the format for proposed **quarterly** variance reports in Table VII-3, part 2 (at p. 47). As displayed there, the proposed format will show explicitly the percentage of mail that, having failed to meet its delivery target, is delivered one, or two, or three days late.⁹ Hopefully, this reporting

⁸ Destination entry reduces variance and increases reliability (in comparison to origin-entered mail). Reliability is important to most mailers that use Standard Mail, especially those that use the High Density and Saturation products.

⁹ If data in the variance report show **cumulative** percentages delivered within the stated time frame, the actual percent delivered one, two, or three days late can be determined readily by subtraction. The proposed reporting format is a "one-sided" display insofar as it does not reflect early delivery. As indicated above, this is not a problem for mail entered at DSCFs with a service standard of only 3 days. It is a potential infirmity, though, when using
(continued...)

for a variance of **one to three days** beyond the delivery target will include most of the mail for all products, especially for High Density and Saturation Letter product used by Valpak.¹⁰

The proposed quarterly variance reporting format distinguishes between:

- (i) mail with destination entry, and
- (ii) mail not destination entered (*i.e.*, origin-entered mail that receives end-to-end service).

In turn, each of these two entry possibilities contains two target categories — *e.g.*, for origin-entered mail:

- (i) a 3-day through 5-day delivery target, and
- (ii) a 6-day through 22-day delivery target.

Assuming that the Postal Service’s performance measurement system in fact can produce accurate data for the proposed table (after the IMB becomes fully operational), the proposed quarterly variance reports represent a giant step forward in measuring and reporting on performance of High Density and Saturation Letter mail.

Since annual performance will be presented at a high level of aggregation, the more detailed quarterly performance reports will be a vital tool for assessing:

whether the Postal Service is meeting the objective of maintaining the “**high quality service standards** established under section 3691....” [and] in relation to the **rate cap** requirements of 39 U.S.C. 3622(d)(1)(A) when analyzing whether quality of service

⁹(...continued)

the data to develop inferences about reliability for all Standard Mail.

¹⁰ Should the cumulative percentage of all mail within a product that is delivered within +3 days of the target fall significantly below 99 percent, at some later date, the Commission may wish to revisit the question of whether to expand or otherwise change the format so as to provide more information on tail of the mail. For now, the proposed format appears to be a reasonable place to start.

is impacted in order to comply with rate cap requirements.
[Order No. 292, at 6 (emphasis added).]

B. Annual Variance Reporting.

Under the Commission proposal, while detailed reliability (variance) reports for each **quarter** will be submitted, no **annual** reliability report of any kind can be expected (*see* the annual reports illustrated in Order No. 292, Table VII-2 at p. 39). However, PAEA requires an annual variance report (39 U.S.C. § 3652(a)(2)(B)(i)), albeit one which may be “provided at a high level of aggregation.” Supporting the need for an annual variance report is the Commission’s need for such a datum, as the Commission likely will want to receive public input on annual reports, and then need to comment on both the speed **and reliability** for products in its Annual Compliance Determination (“ACD”) (pursuant to 39 U.S.C. section 3653) and in other reports to Congress (pursuant to 39 U.S.C. section 3651). An **annual** measure of reliability (or variance) to accompany the **annual** on-time service performance in Table VII-2.B is required. Even if Order No. 292 were predicated upon the assumption that the Commission could compile its own measure of annual reliability/variance from the Postal Service’s quarterly variance reports, PAEA places responsibility on the Postal Service, and no authority has been identified under which the Commission may waive the requirements of the statute.

Information recorded for each piece of mail in the performance database includes both (i) the target (in terms of days to delivery) and (ii) the actual number of days to deliver.

Without this basic information, it would not be possible to distinguish between pieces that are delivered timely, or 1 day late, or 2 days late, etc. That is, without the basic information just

described, it would not be possible to fill out and provide any of the data in the proposed quarterly reports for on-time performance and variance. Thus, for each product — including High Density and Saturation Letters — the data already planned to be captured by the performance measurement system would enable mail to be recorded (or “tagged”) in terms of “days late.” The number of days late for mail that failed to meet its established target could be indicated by a +1, +2, +3, etc., and a zero might be used to indicate timely delivery for each piece that meets (or, exceeds) its target delivery date.¹¹ Use of a well-understood measure of reliability, such as the standard deviation, would help increase transparency, as well as facilitate comparisons between years.

An annual report on reliability for all Standard Mail, and all products within Standard Mail, might appear as shown in Table 1, *infra*. The first column is derived directly from the percent delivered on-time. Only that portion of the mail not delivered by the target day is used to compute entries in the last two columns, average days late and standard deviation.

¹¹ Alternatively, if a “two-sided” reliability measure is desired, then when mail is delivered in fewer days than allowed by the service standard, it could be recorded as -1, -2, etc.

Table 1

Illustrative Annual Reliability Report for Standard Mail

Standard Mail Product	Percent Late	Average Days Late	Standard Deviation
High Density and Saturation Letters	xx.x	xx.x	xx.x
High Density and Saturation Flats/Parcels	xx.x	xx.x	xx.x
Carrier Route	xx.x	xx.x	xx.x
Letters	xx.x	xx.x	xx.x
Flats	xx.x	xx.x	xx.x
Non-Flat-Machinables (NFM)s/Parcels	xx.x	xx.x	xx.x

It should not be difficult to design the system to generate — for mail in every product — the number of days late for each piece recorded in the database. Having available this additional datum would enable various statistical reliability measures to be computed in a straightforward manner — for example, for High Density and Saturation Letters (i) standard deviation for the entire universe or, alternatively, (ii) standard deviation for only that portion of the mail not delivered timely (but for 100 percent of the tail of the mail, including all pieces delivered more than +3 days late, as indicated in Table 1).¹² A comprehensive measure for reliability as shown in Table 1 would facilitate Commission analysis in its ACD. Having such measures available over time also would facilitate analysis of whether quality of service has

¹² The standard deviation could be computed for either the entire product, or for any subset thereof that is capable of being identified in the performance database. To illustrate applicability to subsets, consider First-Class Mail. The standard deviation of late mail could be computed for **all First-Class Mail**, or separately for mail whose delivery standard is (i) overnight, (ii) 2-days, and (iii) 3-5 days. For **Standard Mail**, the standard deviation of late mail could be computed separately for (i) origin entered mail, and (ii) destination entered mail.

been impacted in order to comply with rate cap requirements, which is an important consideration noted in Order No. 292.

Alternatively, as an initial step toward that proposed above, the Commission could integrate variance reporting into the annual report using a format similar to that used in the quarterly reports (with the recommended changes identified *supra*). This would be consistent with the statute and as least put the issue before commenters and the Commission in the annual review and determination conducted under section 3653.

VI. Reporting of Consumer Access

PAEA requires that the Postal Service report annually on “the degree of customer satisfaction with the services provided.” 39 U.S.C. § 3652(a)(2)(B)(ii). It appears that the proposed rules seek to implement this requirement through reporting on (i) customer satisfaction surveys (section 3055.92), (ii) the Mystery Shopper Program (section 3055.93), and (iii) “consumer access” to postal services (section 3055.91). The Commission-proposed reporting on the third item, “consumer access,” would require the Postal Service to provide numbers relating to post offices, delivery points, collection boxes, and wait times at post office retail counters. *See* proposed section 3055.91.

Although customer satisfaction surveys and the Mystery Shopper Program measure “customer satisfaction,” the requirement regarding “consumer access” is fundamentally different. It requires reporting nothing relating to **how customers feel** about the Postal Service, but at best seeks data from which the Commission could then attempt to determine **how the Commission feels** that consumers might feel. Rather than source this requirement to

PAEA's annual reporting requirements which are the subject of this rulemaking, the Commission justifies proposed section 3055.91 on "significant consumer and congressional interest" and its "need[] to be responsive to consumers and Congress." Order No. 292, pp. 30-31. The Commission provides no statutory basis to put this extra reporting burden on the Postal Service, and a perusal of Title 39 yields none. As this requirement is not grounded in 39 U.S.C. section 3652, and appears to be unnecessarily expensive in view of other sources of this information,¹³ it should be withdrawn.

CONCLUSION

The Commission's proposed rules for periodic reporting on service performance measurement are generally well done, but they could benefit from the improvements proposed herein.

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¹³ The Mystery Shopper Program will provide information on the wait times at certain retail counters. That should be sufficient at this time, and additional separate data, which would be expensive to generate, should not be required.