

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, DC 20268-0001

SERVICE PERFORMANCE MEASUREMENT  
SYSTEMS FOR MARKET DOMINANT PRODUCTS

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Respectfully submitted,

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The following are my comments on the Notice and Order Concerning Service Performance Measurement Systems for Market Dominant Products.

There are two separate points that must be evaluated to determine the validity of the final reported readings. One of these is the statistical evaluation and the other is the operational activities involved in obtaining the data to analyze and the effects that various performance conditions will have on the results. I will leave the statistical evaluation to others to comment on.

I am also limiting my comments to those that relate to single piece First-Class Mail. The present system of EXFC is used by IBM. One of the major conditions in their program

is that the operation of the program must not be disclosed to the Postal Service. To ensure unbiased results, IBM requires that reporters keep their participation in the study confidential and do not discuss it with one's postal carrier or other USPS employees. In the past there have been instances where postal employees were caught gaming the system. There were probably many more instances that this took place. The Postal Service made the point many times during the technical conference that if employees don't do their job correctly, it will be referred to the Inspector General or the Inspection Service "guns and badges". I can't believe that most of the problems associated with these problems, for example a carrier making an early collection, will rise to the top of their workload.

The EXFC program has caused the Postal Service to make many changes to their activity just in case there might be an EXFC mail piece involved. For example, a missed blue collection box tap would result in a call that night to the Postmaster and require an evening trip to collect the box and make a trip to the plant just in case there MIGHT be an EXFC drop in that box or making special trips to have the mail delivered on the correct date if it was missent to the wrong carrier route of associated office. With the proposed system, as long as all "beeps" have been responded to, there is no reason to worry about a missed collection time. On the other hand, the system being proposed by the Postal Service will be completely known by postal employees. The entire "first mile" and "last mile" activity will be completely managed and reported by the postal employee. The Postal Service has not provided any information on the effects that this will have on the results. Furthermore, more importantly, the Postal Employee will know that certain mail is NOT being tabulated. Having the data being provided by the Postal Service employees brings back memories of the system used by the post office many decades ago to evaluate the percentage of mail delivered on time. If I recall the system, an employee would go through trays of mail and tabulate the conditions for every, for example, 17<sup>th</sup> mail piece in a tray of mail. The system was called ODIS and the results always seemed to be 100 percent on time. Yet when I evaluated the tub or more mail coming into my father's office, the on time percentage was in the vicinity of 60 to 70

percent if I recall. I can only assume that under this USPS program, if the 17<sup>th</sup> mail piece had a problem, they would just utilize the 18<sup>th</sup> piece.

One piece of information that would have an effect on the Postal Service doing the data collection is how often a beep is sent to a given carrier or at a given facility? If a carrier gets several beeps a day, it will become part of their routine; whereas, if a given facility gets one beep a week, it will become a special event and they may feel that they can game the system.

It appears that the scanner device will be a two-way street in that the base station will send a beep to the device and respond to the request and send the data back to the base station computer as it was scanned. If it was a one-way street, it would appear to not have the ability to coordinate the mail pieces with the scanned data. How long will the carrier have to respond to the beep? What happens if the carrier is on lunch when the beep is received?

The scanner will have a GPS with the ability to send back the geographic coordinates of the scan that was being made. There is no indication of the resolution of the latitude/longitude values for a given scan, in other words how much can move away from a given point and not change the lat/long that gets utilized. A specific ZIP+4 covers an entire block face, namely one side of the street between two adjacent cross streets. How close are the coordinates given in the database for each blue collection point, lobby drop, and ZIP+4 delivery point?

How will the scanner be able to distinguish mail that is placed in an incorrect post office box? Particularly in a small office, will the scanner be able to distinguish between the lobby drop and the outside collection box? On a multi-blue box collection point, how will it distinguish each of the separate collection boxes to ensure all of them are collected?

How will the scanner distinguish that the mail was delivered to the right house and even more so, the correct apartment box?

The major advantage of the EXFC program is that it will measure the bottom line, namely for a given mail piece that was placed in a blue collection box prior to the scheduled collection time be delivered to the proper addressee prior to the box-up time on the correct day or on the correct day at a non-post office box addressee on the correct day.

There is some discussion on including mail which is given to the carrier while making deliveries to their route customers. One of the difficulties on including this type of mail in the program is that the carrier will not collect from a house delivery, as opposed to a curbside delivery, if there is no mail to be delivered to the customer that day. Also would the carrier be required to scan all pieces of mail collected this way? There also is some question on what happens to the mail with respect to the ability to have all mail arrive at the processing center on the same day it is collected by the carrier. The requirement to have a weekday collection and subsequent dispatch at the post office of 5 PM or later only applies to city delivery offices. Many of these city delivery offices have an earlier final dispatch on Saturday. There are many offices that have only rural and/or HCR delivery and therefore do not have the 5 PM collection. Many of these offices have final weekday pick-up of late morning or early afternoon. If these offices are to follow the concept of having the final collection time no earlier than one hour earlier, their final dispatch time will be after the rural and HCR carriers return from their routes. The collection times shown on a blue collection box are related to the available transportation while the times that carriers return from their routes varies considerably.

There are many items that will affect the EXFC results and may not affect the proposed system. The following could occur on the first mile:

The blue collection box is collected early.

The blue collection box is not collected on a given day.

Not all of the mail is removed from the blue collection box.

Not all the mail is removed from the vehicle.

Not all the mail is sent to the processing plant.

Not all the mail is processed properly on arrival at the processing plant

The following could occur on the last mile:

The mail is sent to the wrong associate office by the plant. Last month I received two scanned Priority Mail articles from the same sender. One was missent to Tenafly NJ 07670 and the second missent to Teaneck NJ 07666 rather than the correct Englewood NJ 07631. One was brought to Englewood so it would be on time and the other was sent back to the plant so it was delivered a day late.

The mail is not properly processed in the delivery office.

Not all mail was processed at the delivery office.

The mail was sorted to the wrong carrier route.

The mail was delivered to the wrong delivery point.

The EXFC program makes sure that the quality of the mail and the accuracy of the address is appropriate while with random mail in the proposed system, the quality of the mail is not guaranteed and the mail may end up being forwarded to a new address. EXFC attempts to match the percentage of hand written mail to printed addresses that exists while the new program does not take that into account. If anything takes place with the new system, the postal carrier would have less hand written mail scanned since printed addresses should have a higher percentage of mail on time. EXFC probably has other characteristics that are designed to match what's in use. The carrier

performing the collection could miscount a 6 by 9-inch envelope being called a flat rather than the correct scan as a letter.

During the technical conference, it appeared that the new system was designed to provide for the improvement of mail processing rather than data collection. Will the data collection be secondary to the mail processing function?

If the Commission approves that new system, it should be run in parallel with the existing EXFC system to compare the results of both systems to each other. Even if there is similar results from the two systems, there is still the perception by the public that the results are not independent of the Postal Service.