

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

ANNUAL COMPLIANCE REVIEW, 2016

Docket No. ACR2016

MOTION OF THE UNITED STATES POSTAL SERVICE
FOR CLARIFICATION OF FY 16 ACD INFORMATION REQUEST
(May 22, 2017)

Pursuant to 39 C.F.R. § 3001.21(a), the United States Postal Service hereby respectfully moves for clarification of one of the Commission's information requests contained in its Annual Compliance Determination Report for FY 2016 (FY 16 ACD) issued on March 28, 2017.

In Chapter 5, Subsection A.4 of the FY 16 ACD, the Commission reviewed the Postal Service's FY 2016 service performance results separately by class. In subsection A.4.a, the Commission reviewed First-Class Mail service performance (at pages 129-133). Having analyzed the First-Class Mail service performance in depth, the Commission directed the Postal Service to provide certain specified data for FY 2017 Quarters 1 & 2 within 90 days of the issuance of the FY 16 ACD (i.e., by June 26, 2017), and also to provide that data annualized for the fiscal year in the FY 2017 Annual Compliance Report (in December 2017).

The data that the Commission directed the Postal Service to provide as part of its analysis of First-Class Mail in Chapter 5, subsection A.4.a of its FY 16 ACD fall within six different topics (pages 133-135). Topic number 3 is "Origin Processing" (on page

134). Topic 3 includes three subparts (a), (b), and (c), as follows:

3. *Origin Processing:*

- a. *All facilities that appeared on the Bottom Ten report for four or more consecutive weeks during FY 2017. For each identified facility, please state the corresponding district, all dates the facility appeared on the Bottom Ten report, the number of total piece failures at that facility for each date, and the total volume of mailpieces at that facility for each date. See February 21, 2017 Response to CHIR No. 1, question 6.d.*
- b. *The percentage of First-Class Mail Single-Piece Letters/Postcards with origin processing delays, disaggregated by district and service standard, for each quarter and annually for FY 2017. See January 10, 2017 Responses to CHIR No. 1, question 7.*
- c. *The national percentage of First-Class Mail Single-Piece Letters/Postcards with origin processing delays, disaggregated by service standard, for each quarter and annually for FY 2017. See February 10, 2017 Responses to CHIR No. 13, question 1.*

FY 16 ACD at 134.

The questions in subparts 3(b) and 3(c) both expressly refer to “First-Class Mail Single-Piece Letters/Postcards.” The question in subpart 3(a) does not use those words, but we infer that this question, like the other subparts, also seeks data related to First-Class Mail Single-Piece Letters/Postcards. As noted above, these information requests arose specifically within the Commission’s analysis of the service performance of First-Class Mail in Chapter 5, subsection A.4.a of its FY 16 ACD (pages 129-135). In particular, the Commission’s analysis of the origin processing delays (at pages 112-115) focused expressly on First-Class Mail Single-Piece Letters/Postcards. Likewise, in the sentence that preceded the directive for this information (on page 133), the Commission described its focus on “the different processing phases of First-Class Mail Single-Piece Letters/Postcards.”

In the FY 16 ACD (at page 135), the Commission explicitly encouraged the Postal Service to file a motion for clarification if necessary to clarify any of these six information requests. Accordingly, through this motion, the Postal Service respectfully requests clarification that the question in subpart 3(a), like subparts (b) and (c), pertains to First-Class Mail Single-Piece Letters/Postcards. If, contrary to our understanding of this question, subpart 3(a) instead encompasses other mail, then the Postal Service would need to divert substantially greater resources (i.e., more personnel work hours) to gather the necessary data to provide responses for subpart 3(a).¹ Rather than commit precious resources unnecessarily when we infer that the Commission's intent was to request data related to First-Class Mail Single-Piece Letters/Postcards, we request the Commission's confirmation that subpart 3(a) relates to First-Class Mail Single-Piece Letters/Postcards.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Anthony F. Alverno
Chief Counsel
Global Business and Service Development

Eric P. Koetting
Jeffrey A. Rackow

¹ As quoted above, the format of the response to subpart 3(a) is supposed to follow the format of the Postal Service's "*February 21, 2017 Response to CHIR No. 1, question 6.d.*" The content of that response was not limited to First-Class Mail, and, as a result, it required substantially more time to complete. That CHIR No. 1 was issued January 3, 2017, with 21 questions. The Postal Service filed timely responses to all other questions (Nos. 1-5 & 7-21) on January 10, 2017. However, due to the substantial data that needed to be gathered for question No. 6, the Postal Service did not file the response to question No. 6 until February 21, 2017.

475 L'Enfant Plaza, SW
Washington, D.C. 20260-1101
(202) 268-6687, Fax -5418
May 22, 2017