

BEFORE THE
POSTAL REGULATORY COMMISSION

Periodic Reporting (Proposal Four) : Docket No. RM2017-8

MOTION OF UNITED PARCEL SERVICE, INC. FOR
ISSUANCE OF INFORMATION REQUEST TO
THE UNITED STATES POSTAL SERVICE

(July 18, 2017)

United Parcel Service, Inc. ("UPS") respectfully requests that the Presiding Officer issue an Information Request to the Postal Service to obtain answers to the appended questions.

In Docket No. RM2015-8, the Postal Service submitted Proposal Four, relating to a procedure by which Form 3999 data would be used annually to update the estimated proportion of time on regular city carrier routes spent delivering parcels. In Order No. 3993, the Commission established Docket No. RM2017-8 to consider the issues raised by the Postal Service's Proposal Four.

UPS believes that it needs additional data and information regarding the Form 3999 dataset in order to provide well-informed comments on Proposal Four. As the Commission has observed, the Postal Accountability and Enhancement Act "relies on public transparency . . . to achieve its goal of Postal Service accountability." Second Notice of Proposed Rulemaking to Establish Procedure for According Appropriate

Confidentiality, Order No. 194, Dkt. No. RM2008-1 (March 20, 2009) at 2. Answers to these questions would support the important goal of facilitating potential improvements in the Postal Service's measurement of attributable costs.

Respectfully submitted,

UNITED PARCEL SERVICE, INC.,

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PROPOSED QUESTIONS:

1. Please confirm that the route evaluations whose results are reported in the Form 3999 dataset are conducted as part of a route restructuring process. If not confirmed, please explain the reasons why these route evaluations are carried out.
2. Please describe the process leading up to a decision by the Postal Service to evaluate whether a city carrier deliver route needs to be restructured.
 - a. What events, circumstances, or thresholds trigger a decision to conduct a route evaluation?
 - b. What performance measures are consulted when a route evaluation is being considered? Please identify specific data sources that are consulted or that feed into this process.
 - c. To what extent is a decision to evaluate a specific route influenced by or otherwise related to a decision to evaluate geographically contiguous or otherwise related routes?
3. Please indicate whether on a going forward basis the Postal Service intends to increase, decrease, or hold constant the number of city carrier route evaluations it conducts per year.
4. Please explain whether the Postal Service expects its seasonal distribution of route evaluations to remain constant or whether it expects to modify the seasonal distribution.