



on the pieces traveling through its network. Yet when reporting on service, the Postal Service stubbornly insists on using measures and indices that are highly edited and aggregated. This works to obscure the true picture on service performance. For instance, Marketing Mail Letters can be entered at varying entry points to qualify for different discounts. Reporting on this product in aggregate masks what may be important difference in service performance between pieces entered at an NDC versus those entered at an SCF.

Disaggregation by entry point is only one way in which service performance reporting could be enriched. USPS has the relevant information to report service quality using the following variables:

- Entry facility
- Weekday of entry
- Month of entry
- Delivery point type
- Route type
- Acceptance point
- Delivery zip code

Undoubtedly there are many other dimensions that might be relevant to different users of the Postal Service, and useful in diagnosing the cause of service failures. PostCom is not suggesting that the Postal Service collect any additional information. The Postal Service's Informed Visibility (IV) platform already enables collection of service information that is used internally for diagnostic and analytic purposes. As postal customers are required to provide the raw material for this activity, they deserve to see the resulting information.

PostCom expects that if USPS is asked to provide this information, it will most likely claim that providing more information is an undue burden or will expose commercially sensitive information. The former claim is dubious at best; current reporting practices require resources to ensure that raw service performance information be massaged to provide as rosy a picture as possible. As to the latter objection, these are monopoly products. The customers using those products deserve a complete, unbowdlerized picture on how they are performing.

## **II. THE POSTAL SERVICE'S SERVICE IMPROVEMENT PLAN IS INADEQUATE**

The Postal Service's service improvement plan – which is comprised of a mere four paragraphs – is wholly inadequate and suffers from some of the weaknesses identified above. For instance, USPS uses only composite targets for its major product categories. In the case of First-Class Mail, flats are overwhelmingly outnumbered by letters. Mathematically this means that flats service performance is meaningless. It would be naïve to assume that use of such a biased indicator has no impact on management decision making. It is no coincidence, and it shouldn't be a surprise that flats service has consistently lagged letter service. *See, e.g.*, Public Representative Comments at 5 (Feb. 1, 2018).

In addition to relying on deceptive composite scorekeeping, the plan is devoid of specifics. In describing its plan, USPS asserts that:

We will continue to implement operational, technological and training initiatives, which began in FY2017, to improve the mail delivery process and achieve our targets in FY2018. We will implement improved software to generate better daily operational plans. We will also continue to develop and deploy more precise tools, such as Informed Visibility, to scan and track mail at every step of the mail-handling process.

We will also improve the training of field personnel in mail handling. This includes familiarizing all employees with the mail processing activities throughout postal plants to help them better identify and understand operational inefficiencies. We will keep employees engaged through daily huddles, where they will discuss the day's workload. We will improve procedures and deploy

new technologies to improve the efficiency of our mail-handling and delivery processes.

We will increase operational maintenance and the presence of maintenance personnel to reduce inefficiencies due to equipment failure. In addition, we will implement other operational changes. This includes increasing the amount of advanced mail (i.e., mail that is processed ahead of schedule), ensuring that all late arrival mail is captured and improving delivery point sequencing procedures to make delivery operations more efficient.

FY 2017 Annual Report at 20. Although this all sounds well-intentioned, it is utterly lacking in specifics. A plan for improvement should – at a minimum – describe how intended actions will achieve desired outcomes within a specified period of time. These paragraphs do nothing of the sort. The Commission should insist that the Postal Service explain how – and to what degree – any of these actions will impact service and erase the perennial service deficit that postal customers endure.

Respectfully submitted,  
*/s/ Matthew D. Field*

Matthew D. Field  
Ian D. Volner

VENABLE LLP  
600 Massachusetts Ave., NW  
Washington, DC 20001  
(202) 344-8281  
[mfield@venable.com](mailto:mfield@venable.com)  
[idvolner@venable.com](mailto:idvolner@venable.com)

*Counsel for Association for Postal Commerce*