

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

SERVICE PERFORMANCE MEASUREMENT  
SYSTEMS FOR MARKET DOMINANT PRODUCTS

Docket No. PI2015-1

**UNITED STATES POSTAL SERVICE MOTION FOR CLARIFICATION  
OF ORDER NO. 4697**  
(August 16, 2018)

The United States Postal Service (“Postal Service”) respectfully requests that the Postal Regulatory Commission (“Commission”) clarify Order No. 4697 (“Order”).<sup>1</sup> As set forth more fully below, the Postal Service seeks clarification of four important statements in the body of the Order. Clarifying these statements will aid in the understanding of the new internal Service Performance Measurement (SPM) system on the part of the Commission, the Postal Service, and other interested parties, as well as avoid future confusion concerning the operation of the SPM system.

First, the Postal Service seeks clarification of the sentence straddling pages 17 and 18 of the Order, which reads as follows:

Mail left for carrier pickup at individual mail receptacles (home mail boxes) is not included in measurement.

The Postal Service notes that, under the new SPM system, while mail left for pickup at individual mail receptacles is not included in measurement for the First Mile stage, such mail would be included in the Processing Duration stage, with the potential to be randomly sampled during the Last Mile stage; thus, some of this mail left for pickup would be included

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<sup>1</sup> Order No. 4697, Order Approving Use of Internal Measurement Systems, July 5, 2018.

in SPM measurement. Considering the above, it would be more accurate to rephrase the above sentence as follows:

Mail left for carrier pickup at individual mail receptacles (home mail boxes) is not included in First Mile measurement.

Second, the third full paragraph on page 18 of the Order reads as follows:

For mail entered at retail facilities, the Postal Service scans mailpieces that include Special Services such as Registered or Certified Mail.

These mailpieces include unique mailpiece identifiers that may be used to start the clock for the First Mile measurement.

While the above paragraph is accurate, the Postal Service would note that there are additional indicia barcodes generated at the retail counter, such as the postage label. The generation of such labels is sufficient to start the clock, meaning no additional scanning is required.

Third, footnote no. 56, on page 43 of the Order, reads in part: “The evaluation of results from FY 2017 Quarter 1 was not submitted to the Commission.” In fact, the Postal Service did submit an evaluation of FY 2017 Quarter 1 results when it provided a “trial run” (or “proof of concept”) audit of Quarter 1 performance results in response to a Commission Information Request. See “Independent Validation of USPS Service Performance Measurement Audit Design FY2017 Quarter 1” (by ICF), dated May 26, 2017, filed as part of Responses of the United States Postal Service to Questions 1-16 of Commission Information Request No. 1, June 12, 2017, Response to Question 1.c. (link: <https://www.prc.gov/dockets/document/100391> ).

Fourth, on page 64 of the Order, Table 10, Persistent Limitations of Proposed Service Performance Measurement System, First Class Mail – Single Piece Flats section, paragraph (2), reads in part:

In addition, retail clerks will be randomly prompted to scan mailpieces coming across the retail counter, in order to incorporate those pieces into the First Mile Impact score.

Although an earlier version of the SPM Plan stated as much, the Postal Service revised the Plan in its February 23, 2017 filing of Library Reference 8.2 Under the revised SPM system, retail clerks will not be prompted to scan mailpieces coming across the counter, as this additional step is not necessary: clerks scan each Special Services mailpiece's barcode as part of their normal work duties, which enables First Mile measurement in the SPM system.

For the reasons stated above, the Postal Service respectfully requests that the Commission clarify the outstanding issues identified in this motion, by issuing either a revised order, or a follow-up filing clarifying Order No. 4697.

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<sup>2</sup> Compare section 4.2.2.1., First Mile Impact, page 24, fifth paragraph, of "United States Postal Service – Service Performance Measurement – Revised February 21, 2017" (blackline version: Internal SPM Plan blackline.pdf) with section 4.2.2.1., First Mile Impact, page 30, second paragraph, of "United States Postal Service – Service Performance Measurement – Revised February 21, 2017" (redline version: Internal SPM Plan redline.pdf), in USPS-LR-PI2015-1/8 – USPS Service Performance Measurement Plan, February 23, 2017 (link: <https://www.prc.gov/dockets/document/99225> ).

Respectfully submitted,

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