



**Comments of American Consumer Institute Center for Citizen Research  
Regarding Docket No. ACR2018 and in response to Order No. 5055  
Submitted to the United States Postal Regulatory Commission  
April 19, 2019**

The American Consumer Institute (“ACI”) hereby submits these comments to address the compliance issues discussed by the Commission in its recently released Annual Compliance Determination (ACD2018) for Fiscal Year 2018. As previously discussed by ACI, the U.S. Postal Service’s overall Fiscal Year 2018 performance was characterized by its immense debt growth and financial challenges.<sup>1</sup>

We appreciate the Commission’s acknowledgement of our initial comments to the ACR2018 docket and ACI aims to continue to be a part of the dialogue within the Postal Community and involved with constructive conversations of potential reforms that best meet the public interest objectives for a modern postal system.

ACI also acknowledges the importance of the key preliminary determinations and new information detailed in the ACD2018. On Service Performance and Customer Access, it comes as no surprise that most products failed to meet their service performance targets for FY 2018, and ACI is particularly discouraged by the apparent decline in on-time delivery frequency for all First-Class Mail products.

While the Commission observes that the Postal Service has made progress in developing quantitative analysis through root cause assessments, we believe the Commission must be exhaustive in using all tools available at its disposal to compel meaningful changes in behavior on the part of the USPS. Directing the Postal Service to provide more transparency regarding the progress and effects of performance strategies would be most effective if coupled with tangible actions for the Postal Service to take in order to improve reliability for its largest consumer base.

Impactful corrective actions can also be achieved by advancing key transparency measures on Inbound Letter Post data. As indicated in the ACR2018, inbound letter mail is one

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<sup>1</sup> Comments of American Consumer Institute Center for Citizen Research, Regarding Docket No. ACR2018, Submitted to the United States Postal Regulatory, Commission January 31, 2019, <https://www.prc.gov/docs/108/108143/ACI%20Comments%20-%20ACR2018.pdf>.

of multiple lines of service for which the Postal Service incurred a negative contribution. This is apparent not only for 2018, but detailed in prior years.

Our organization believes that giving regulators, lawmakers, and the general public the ability to understand the financial inner workings of under-water products on an individual basis is essential for ultimately rooting out below-cost pricing and identifying where and how to control costs. Thus, ACI concurs with the Commission's preliminary determination that the data and analysis contained in the Library Reference for Inbound Letter Post should be unsealed.

ACI appreciates the opportunities provided by the Commission within the ACR2018 docket to share our organization's viewpoints on the vast challenges at hand for the U.S. Postal Service and the processes involved for implementing corrective measures.

Respectfully submitted,

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