

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

ANNUAL COMPLIANCE REVIEW, 2019

Docket No. ACR2019

**RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
STEVE HUTKINS' MOTION FOR INFORMATION REQUEST NO. 4**
(October 14, 2020)

Pursuant to 39 CFR § 3010.160(b), the United States Postal Service (Postal Service or USPS) hereby files this Response to Steve Hutkins' Motion for Issuance of Information Request No. 4, Seeking Clarification or Correction of Service Performance Report filed on October 13, 2020 ("October 13, 2020 Motion"). The Postal Service respectfully requests that the Postal Regulatory Commission (PRC or Commission) deny Mr. Hutkins' October 13, 2020 Motion. The relief he seeks is unnecessary.

Mr. Hutkins requests that the Commission issue a new information request in this matter in order to clarify the Postal Service's service performance reports. Specifically, Mr. Hutkins argues that the data in the service performance report that the Postal Service filed with the Commission on October 7 in this matter do not match the data that the Postal Service submitted to the court in *Jones v. United States Postal Serv.*¹ Based on this contention, Mr. Hutkins requests that "the Commission ask the Postal Service to clarify if the two reports should have the same scores and, if so, to make whatever

¹ October 13, 2020 Motion at 1-2; See *Jones v. United States Postal Serv.*, No. 20 Civ. 6516 (S.D.N.Y. Sept. 21, 2020).

corrections may be necessary, in either the data submitted in Jones or the data submitted to the Commission.”²

The Postal Service submits that these two reports should not be expected to have the same service performance scores. The two data presentations he cites reflect extracts from a dynamic database taken at different points in time. In his October 13, 2020 Motion, Mr. Hutkins references service performance scores in the current quarter and these scores are subject to change. As the Postal Service previously noted in its filings in this matter, the Postal Service reports service performance data to the Commission on an annual and quarterly basis pursuant to 39 CFR Part 3055.³

“Adhering to all these well-established timetables allows the Postal Service to properly review and finalize all its data and ensure its accuracy before the Postal Service files these data with the Commission. These processes and procedures are employed at the end of each quarter.”⁴ Once a quarter closes, the service performance results are reviewed and finalized. Prior to the close of the quarter, however, service performance scores are subject to change.⁵

The data that the Postal Service filed with the Commission on October 7 match the data in the weekly reports that the Postal Service provides to the United States Congress. While the Postal Service each week adds information for the most recent

² October 13, 2020 Motion at 2-3.

³ Response of The United States Postal Service to Steve Hutkins’ Motion for Issuance of Information Request No. 3, PRC Docket No. ACR2019 (August 28, 2020), at 3.

⁴ *Id.*

⁵ In its filing with the court in *Jones*, the Postal Service also specifically noted that “scores provided for each week in a quarter may not exactly match the official scores filed with the Postal Regulatory Commission (PRC) at the end of the quarter.” October 13, 2020 Motion at 4.

week to these reports, it does not refresh each of the entries for the previous weeks that were submitted earlier. In contrast, the data that the Postal Service provided to the court in *Jones* includes data about service variance, which the Postal Service does not provide to the United States Congress. To create these variances, the Postal Service had to pull fresh data at a different point in time. Hence, the weekly data in these reports are different and these two reports should not have the same service performance scores. The inconsistencies Mr. Hutkins observes are merely the results of timing differences, not the result of any inadvertent errors in the extraction process. As Mr. Hutkins acknowledges, his request for reconciliation is premised on the expectation that the two sources should match, and as explained above, that premise is faulty. Accordingly, the Commission should deny Mr. Hutkins' October 13, 2020 Motion.

Respectfully submitted,

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