

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

ANNUAL COMPLIANCE REVIEW, 2020

Docket No. ACR2020

RESPONSES OF THE UNITED STATES POSTAL SERVICE TO
QUESTIONS 1-7, 10-20 OF CHAIRMAN'S INFORMATION REQUEST NO. 6

The United States Postal Service hereby provides its responses to the above-listed questions of Chairman's Information Request No. 5, issued on January 28, 2021. Each question is stated verbatim and followed by the response. Responses to questions 8 and 9 are still being prepared.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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1. Please identify the source system(s) and/or database(s) used to report the data presented in the Responses of the United States Postal Service to Questions 1-21 of Commission Information Request No. 1, January 15, 2021, questions 1.b. and 6.b. (Response to CIR No. 1).

RESPONSE:

The Postal Service's Time and Attendance Collection System (TACS) was the source of the data.

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2. Please provide the data underlying the charts presented in Response to CIR No. 1 questions 1.b. and 6.b. in an Excel Spreadsheet presenting the Postal Service employee availability percentage for each month and quarter of FY 2019, FY 2020, and the first quarter of FY 2021. Please disaggregate these data by the following categories: Function 1 Operations—Mail Processing, Function 2 Operations—Delivery Services, Function 4 Operations—Customer Service, and Labor Distribution Code 79 Mailing Requirements and Business Mail Entry. Please disaggregate these data for each Postal Service geographic Area and for the nation. Please also disaggregate FY 2019 and FY 2020 data into mid-year, second-half, and annualized.¹

RESPONSE:

The Excel spreadsheet electronically attached in association with this response presents the underlying data as requested. Specific tabs within the spreadsheet map to specific components of the request.

- Figure – 1b: This includes the data behind the two charts provided in the question 1.b. response. The charts include FY 2020 data only.
- Figure—6b: This includes the data behind the chart provided in the question 6.b. response. The chart includes FY 2020 data only.
- Month_Quarter: This includes tables with the “employee availability percentage for each month and quarter of FY 2019, FY 2020, and the first quarter of FY 2021.”
- Month_Quarter_Func: This includes tables with the “employee availability percentage for each month and quarter of FY 2019, FY 2020, and the first quarter of FY 2021” further disaggregated by Function 1, 2, 4, and Labor Distribution Code 79 (LDC79).
- Area_National: This includes tables with “employee availability percentage for each month and quarter of FY 2019, FY 2020, and the first quarter of FY 2021” disaggregated by Area. National figures are available in the “Month_Quarter” tab.

¹ Mid-year refers to the aggregation of the data for Quarters 1 and 2 of a fiscal year. Second-half refers to the aggregation of the data for Quarters 3 and 4 of a fiscal year. Annualized refers to the aggregation of the data for all four quarters of a fiscal year.

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- MidYear_2ndHalf: This includes employee availability percentages disaggregated into mid-year, second-half, and annualized.

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3. Please refer to Docket No. ACR2020, Library Reference USPS-FY20-17, December 29, 2020, United States Postal Service FY 2020 Annual Report to Congress, at 2. Please provide an Excel Spreadsheet containing the number of Postal Service employees reported to be absent related to COVID-19 (including absences due to contraction, quarantine/isolation, and/or caregiving related to COVID-19), reported to have contracted COVID-19, and reported to have died from COVID-19 for each month of FY 2020 and the first quarter of FY 2021. Please disaggregate these data by the following categories: Function 1 Operations—Mail Processing, Function 2 Operations—Delivery Services, Function 4 Operations—Customer Service, and Labor Distribution Code 79 Mailing Requirements and Business Mail Entry. Please disaggregate these data for each Postal Service geographic Area and the nation.

RESPONSE:

The most current available data responsive to this request with regard to Fatalities and Positive/Presumed Positive cases can be found in the electronic attachment (Excel file) associated with this response.

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4. Please refer to the Response to CIR No. 1, question 18.a. Please provide an Excel Spreadsheet containing the numbers of Postal Service regular workhours, non-penalty overtime workhours, and penalty overtime workhours for each month of FY 2019, FY 2020, and the first quarter of FY 2021. Please disaggregate these data by the following categories: Function 1 Operations—Mail Processing, Function 2 Operations—Delivery Services, Function 4 Operations—Customer Service, and Labor Distribution Code 79 Mailing Requirements and Business Mail Entry. Please disaggregate these data for each Postal Service geographic Area and the nation as well as by career versus non-career employees.

RESPONSE:

The available data responsive to this request can be found in the electronic attachment (Excel file) associated with this response. Note that, in accordance with recent changes to the Postal Service's IT structure, the breakouts correspond to the Postal Service's new organizational structure.

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5. Please refer to Library Reference USPS-FY20-29, December 29, 2020, Excel file "FY20 FCM Q3 CLT Natl Area Dist.xlsx," tab "4.c.3. CLT" and Library Reference USPS-FY19-29, December 27, 2019, Excel file "FY19 ACR FCM Q1-2-4-5 EOY.xlsx," tab "Q4." Please explain how the Postal Service decreased the number of critically late trips (CLTs) from 17,034 in FY 2019 to 8,955 in FY 2020.

RESPONSE:

The Logistics group has been working with field processing operations over the past year to emphasize operating trips on time to support overall network performance. The Postal Service seeks to ensure that the planned mail is available on the dock/platform to load timely to support on-time departure. In addition, the Postal Service has been working with its suppliers, emphasizing service and the relationship to on-time arrival, load, and departure to achieve service performance targets. This focus has contributed towards improvement in performance in FY 2020, even with the constraints of the COVID-19 pandemic.

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6. Please provide an Excel spreadsheet covering the period FY 2019, FY 2020, and the first quarter of FY 2021, displaying variance data for First-Class Mail, USPS Marketing Mail, and Periodicals on a weekly basis. Please disaggregate these data for each Postal Service geographic Area and the nation. Rather than limiting the report to 3 days after the service standard, please extend the data for up to 10 days extra or as many extra days as are necessary until 99 percent of the mail is accounted for.

RESPONSE:

The Excel spreadsheet entitled "FY20.ChIR.No.6.Question6Response.xlsx" is provided.

Please note that the data sets start at 2/9/2019 because of data retention limitations. In all cases, the data readily available cover up to +15 days. In a few cases, the number of days until 99 percent of the mail is accounted for exceeded 15 days.

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7. Please refer to the Response to CIR No. 1, question 17. Please provide an Excel Spreadsheet containing the numbers of late and extra trips to transport mail for each month of FY 2019 and FY 2020 for each Postal Service geographic Area and the nation.

RESPONSE:

Please see the spreadsheets that accompany these responses.

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- 10.** Please provide an Excel Spreadsheet containing the nationwide volume of:
- a. political mail that the Postal Service delivered in each month of FY 2020.
 - b. election mail that the Postal Service delivered in each month of FY 2020.
 - c. Decennial Census mail that the Postal Service delivered in each month of FY 2020.

RESPONSE:

Please see the spreadsheets that accompany these responses.

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11. Please refer to the Response to CIR No. 1, questions 17.e., 18.d., 19.c., and 20.
- a. Prior to the 2020 elections, did the Postal Service complete a study and/or analysis of the impact of political mail and election mail on FY 2020 Market Dominant service performance (such as, based on prior years' elections)?
 - i. If yes, please provide the study and/or analysis. Additionally, please explain how the expected impact differed from the actual impact on FY 2020 Market Dominant service performance and what steps the Postal Service took to mitigate the actual impact on FY 2020 Market Dominant service performance.
 - ii. If no, please explain why no study and/or analysis was completed.
 - b. Prior to the 2020 elections, did the Postal Service generate a plan for delivery of political mail and election mail for FY 2020 (such as, based on prior years' elections)?
 - i. If yes, please provide the plan. Additionally, please explain how and why the plan differed from the actual implementation during FY 2020.
 - ii. If no, please explain why no plan was completed.

RESPONSE:

- a. No such specific study was completed.
 - i. N/A.
 - ii. No specific study was completed as this volume has always been included in the overall Market Dominant service performance.
- b. No formal, written, national plan was generated (but see response to 11.b.ii, below).
 - i. N/A.
 - ii. Although there was no formal, written, national plan generated prior to the 2020 elections, the Postal Service did engage in extensive planning to ensure operational preparedness in advance of the 2020 primary elections and made

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adjustments leading into the general election to address areas of opportunity and anticipated increases in Election Mail volume. This included updating and issuing standard operating procedures, stand-up talks, and other guidance documents, as well as holding trainings and conducting webinars to discuss best practices and common issues, among other things. Political and Election Mail are generally delivered pursuant to the normal delivery practices. However, the Postal Service has historically engaged in efforts to expedite the delivery of ballots as necessary based on local needs and capabilities. These efforts were not previously formalized in writing due in part to the need for local flexibility. During the course of the 2020 election, these plans were put into writing in light of the anticipated increase in volume, the fact that many jurisdictions and voters were using the mail to vote for the first time, and the increased attention on the Postal Service. Please refer to the Extraordinary Measures and Additional Resources documents that were circulated prior to the 2020 General Election, copies of which accompany these responses as part of the attached zip file.

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- 12.** The Postal Service discusses its FY 2020 reorganization of its operations into “separate functions for retail and delivery on the one hand and processing and logistics on the other” in the FY 2020 ACR at 39. Please identify the metric(s) that the Postal Service will use to measure how the restructuring achieves each of the following goals:
- a. establish clear lines of accountability to better enable service performance improvements,
 - b. enhance communication and oversight, and
 - c. ensure quicker implementation of strategies and initiatives.

RESPONSE:

The Postal Service does not intend to use specific metrics to measure the effects of the restructuring along the dimensions specified in the question. Rather, the reorganization is designed to improve corporate performance, and whether that occurs will therefore be measured through the metrics that we use to track and measure overall corporate performance, including NPA, the Get it Right process, etc.

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- 13.** Please refer to the Response to CIR No. 1, question 11.a. Please identify the metric(s) that the Postal Service will use to measure how the newly dedicated letter and flat planning and implementation group achieves each of the following goals:
- a. strategically stabilize all letter- and flat-shaped products,
 - b. create site-by-site specific, achievable operating plans, and
 - c. adjust reporting standards to identify the variance to the individually-planned achieved efficiencies versus the previous method of tracking the variance to one single national operating plan.

RESPONSE:

- a. Stabilization will be determined through predictable and consistent operational compliance. For example, if it is determined that a specific letter operation should be complete every day at a designated time, the Postal Service may evaluate the percentage that operation is achieved by a facility and/or how often.
- b. Currently, Processing Operations is working with Enterprise Analytics to develop a tool that will identify the high level achievable operational timeframes based on each facility's specific details.
- c. Once the facility-specific operating plans have been determined and implemented, operational compliance reports will be adjusted to focus on each facility's unique plan as opposed to looking at a national 24-hour clock set of indicators that does not take into consideration actual capabilities.

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- 14.** Please refer to Library Reference USPS-FY20-29, Excel file "FY20 FCM Q4 EOY - 24 hr clock.xlsx" and Docket No. ACR2019, Library Reference USPS-FY19-29, Excel file "FY19 ACR FCM Q1-2-4-5 EOY.xlsx," Tab "Q5". Other than National Trips On-Time report changes discussed in the Response to CIR No. 1, question 19.a., please confirm that each of the national operating plan targets (also referred to as the 24-Hour Clock national clearance goals) uses the same methodology for FY 2019 and FY 2020. If not confirmed, please explain any changes.

RESPONSE:

Confirmed.

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- 15.** Please refer to Docket No. ACR2018, Responses of the United States Postal Service to Questions 1-15, 17-50 of Chairman's Information Request No. 1, January 11, 2019, question 47.a. through 47.h. and Docket No. ACR2019, Responses of the United States Postal Service to Questions 1-41 of Chairman's Information Request No. 4, January 24, 2020, question 31.b. Please confirm that each of these responses continues to accurately reflect the definitions applied in FY 2020. If not confirmed, please explain and provide any applicable updated definitions.

RESPONSE:

Confirmed.

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- 16.** The Coronavirus Aid, Relief, and Economic Security Act (CARES Act) states that “during the COVID-19 emergency, the Postal Service—(1) shall prioritize delivery of postal products for medical purposes.” Pub. L. No. 116-136 § 6001(c).
- a. Please explain how the Postal Service adhered to this requirement in FY 2020.
 - b. Please explain how the Postal Service’s adherence to this requirement impacted FY 2020 service performance results for Market Dominant products.
 - c. Please explain the types of challenges that the Postal Service faced in distinguishing items sent for medical purposes versus items sent for non-medical purposes in FY 2020.
 - d. For items that the Postal Service identified during FY 2020 as being sent for medical purposes, please quantify the volume and percentage that were classified as Competitive Products versus Market Dominant products. If the Postal Service cannot provide this information, then please confirm that most items that the Postal Service identified during FY 2020 as being sent for medical purposes were classified as Competitive Products.
 - e. Please explain how the Postal Service plans to adhere to this requirement in FY 2021.

RESPONSE:

- a. Initially, please refer to the response to subpart c. below for a discussion of the substantial challenges the Postal Services faces in being able to distinguish clearly between items sent for medical purposes and all other items.

Nevertheless, in FY 2020, as part of our steadfast commitment to delivering medications throughout the nation, Postal Service management continuously reviewed pharmaceutical package service performance to the best of our ability, and worked closely with all mail-order prescription mailers to improve overall service. In addition, weekly operational meetings were established with pharmaceutical mailers to provide updates on service conditions and process

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improvements. More fundamentally, as an organization, the Postal Service has undertaken efforts throughout all levels to ensure timely processing, dispatching and the delivery of pharmaceutical shipments. In FY 2020, these efforts included, to the extent that personnel in the field had some tangible basis to view particular mail pieces as likely constituting a pharmaceutical shipment, trying to expedite handling of such pieces.

- b. As indicated in response to subpart d. below, the Postal Service believes that the vast majority of mail pieces sent for medical purposes were not in the Market Dominant category. Consequently, there is no apparent basis on which to conclude that adherence to this requirement had any particular impact on FY 2020 service performance results for Market Dominant products, or to speculate whether the observed FY 2020 service performance results for Market Dominant products would likely have been any different with or without the Postal Service's efforts to adhere to this requirement.

- c. The mail classes or category (such as First-Class Mail, Marketing Mail, Priority Mail, Parcel Select, etc.) into which mail pieces are entered is currently the key discriminant for how those pieces are worked throughout the postal system. There are presently no distinct elements or descriptors, nor specifications or processes (DMM or otherwise) that allow the Postal service to recognize items as medical versus non-medical. Hence, as the question implies, there exist substantial challenges to being able to distinguish items sent for medical purposes from all other items. Generally, some large volume, Origin drop-

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shipment pharmaceutical mailers, in coordination with our origin facilities, have developed communication and other protocols in attempts to controlling the incoming volumes and thereby expedite processing. But after leaving the origin facility, these items must be combined with other volumes destined for locations throughout the postal network.

- d. Because of the challenges identified in response to subpart c. of this question, the Postal Service could not with confidence identify items during FY 2020 as being sent for medical purposes. Consequently, the Postal Service cannot with confidence quantify the volume and percentage that were classified as Competitive Products versus Market Dominant products. Nonetheless, there are postal customers who the Postal Service has identified as pharmaceutical mailers. The Postal Service examined the FY 2020 total package volume entered by those mailers, and the vast majority (in excess of 99 percent) of that volume was entered within a Competitive Product category. Note that there is no indicator to verify that all of this mail was medical purposes only, and this volume share could thus potentially reflect in some part other volume that these mailers also send through the Postal Service. The observed Competitive product share is so overwhelming, however, that it seems extremely remote that the same qualitative conclusion would not hold for medical packages as well as for total packages sent by these customers. Therefore, it seems reasonable to confirm that most items being sent for medical purposes in FY 2020 were likely classified as Competitive Products.

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- e. As an organization, the Postal Service has undertaken efforts throughout all levels to ensure timely processing, dispatching and the delivery of pharmaceutical shipments, and plans to continue to do so in FY 2021. These efforts will include, to the extent that personnel in the field have some tangible basis to view particular mail pieces as likely constituting a pharmaceutical shipment, continuing to try to expedite handling of such pieces. Furthermore, Postal Service management continuously reviews pharmaceutical package service performance and works closely with all mail-order prescription mailers to improve overall service. The Postal Service has established weekly operational meetings with pharmaceutical customers to provide updates on service conditions and process improvements. As an organization we are fully committed to our pharmaceutical customers. Looking ahead, the Postal Service will remain steadfast in its efforts to achieve further service performance improvements, while operating in an efficient and effective manner. We will continue to monitor service performance and quickly address any issues that may arise.

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17. Please refer to the Response to CIR No. 1, question 7.a. Please confirm that the Postal Service has a metric(s) (such as a root cause failure indicator) to monitor delays specific to transporting First-Class Mail from origin processing to destination processing (*e.g.*, exclude delays that occurred in processing operations).
- a. If confirmed, please identify the metric(s) used and quantify such delays at the national level in FY 2020 and in FY 2019.
 - b. If not confirmed, please explain why such a metric has not been developed and status of the Postal Service's efforts to develop such a metric.

RESPONSE:

Not confirmed.

- a. N/A.
- b. The current root cause logic/business rules for service performance group all pieces that failed service, where the failure point was not the first mile, processing, and last mile operations, into an all-encompassing transit failure segment and is not broken out by specific cause within that segment. However, the Postal Service is considering possible enhancements to the root cause logic for additional breakdowns.

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- 18.** The Postal Service asserts that Last Mile Impact (“LMI”) for each geographic area improved in FY 2020 compared to FY 2019 for First-Class Mail.⁴ Please explain how each of the seven geographic areas was able to improve its LMI for First-Class Mail from FY 2019 to FY 2020. In the response, please identify all key metric(s) used to monitor and remediate Last Mile problems in near-real-time.

RESPONSE:

Many factors contributed to the relative improvement in Last Mile Impact (“LMI”) in the Areas. National training and sharing of best practice were utilized at the Area and District levels during biweekly meetings with the Area Managers of Delivery Programs Support during the pre-COVID-19 period. These meetings provided instruction on better methods of managing delivery unit efficiency, ensuring operational clearance, scanning and improving letter carrier departure times in support of the reduction of last mile failures. Headquarters, along with each Area, have used IV tools to identify those sites with the highest opportunity for improvement. District personnel then work with individual sites to take deep dives into the many factors associated with identifying and reducing last mile failures. For example, during the review process, District personnel ensure that clerks and carriers in the delivery units are knowledgeable with respect to the proper scanning procedures for various mail within their facility. They also work with customer service supervisors to ensure familiarity and usage of the IV Last Mile Diagnostic Tool to identify their individual area(s) of improvement.

⁴ Library Reference USPS-FY20-29, files “CapMetro PRC FY 20 Svc Perf Report.pdf,” at 4; “Eastern PRC FY 20 Svc Perf Report.pdf,” at 3; “Great Lakes PRC FY 20 Svc Perf Report.pdf,” at 2; “Northeast PRC FY 20 Svc Perf Report.pdf,” at 4; “Southern PRC FY 20 Svc Perf Report.pdf,” at 2; “Western PRC FY 20 Svc Perf Report.pdf,” at 3; “Pacific PRC FY 20 Svc Perf Report.pdf,” at 2.

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Mail processing and delivery operations personnel conducted service performance reviews in early FY 2020, which were later paused due to COVID-19. These reviews include assessment of tasks and procedures that should be performed daily in order to reduce service impacts caused by last mile failures. Ongoing dialog among processing operations, transportation and delivery will continue in order reduce the number of last mile failures.

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- 19.** In describing First-Class Mail service performance, the Postal Service observes that each Area experienced increased parcel volume in FY 2020.⁵
- a. Please explain how the Postal Service worked to mitigate how increased parcel volume impacted processing operations, transportation, and the Last Mile for First-Class Mail in FY 2020.
 - b. Please confirm that the explanations provided in response to part a. of this question apply to USPS Marketing Mail, Periodicals, and Package Services. If not confirmed, please explain how the Postal Service's action differed for each class.
 - c. Please explain how the Postal Service expects to mitigate how increased parcel volume may impact processing operations, transportation, and the Last Mile for First-Class Mail in FY 2021.
 - d. Please confirm that the explanations provided in response to part c. of this question apply to USPS Marketing Mail, Periodicals, and Package Services. If not confirmed, please explain how the Postal Service's expected actions differ for each class.

RESPONSE:

- a. In processing operations, additional employees were hired pursuant to the applicable bargaining agreements. Processing operations also used justified and approved overtime hours where needed and when able. For transportation, mail was placed on earliest possible dispatch and additional trips were added as necessary. In delivery, carriers started the morning doing early parcel runs and returned to the office for letters and flats and any remaining packages.
- b. Confirmed.

⁵ Library Reference USPS-FY20-29, files "CapMetro PRC FY 20 Svc Perf Report.pdf," at 3-4; "Eastern PRC FY 20 Svc Perf Report.pdf," at 3; "Great Lakes PRC FY 20 Svc Perf Report.pdf," at 2; "Northeast PRC FY 20 Svc Perf Report.pdf," at 4; "Southern PRC FY 20 Svc Perf Report.pdf," at 2; "Western PRC FY 20 Svc Perf Report.pdf," at 3; "Pacific PRC FY 20 Svc Perf Report.pdf," at 2; Response to CIR No. 1, question 20.

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- c. The Postal Service will continue the use of the Network Operations Control Centers to perform real-time data analysis and communicate with plants on issues related to operations and transportation. Delivery operations will continue their primary focus of managing their operations, including First and Last Mile impacts and employee engagement.
- d. Confirmed.

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- 20.** Please provide an Excel spreadsheet covering the period FY 2019, FY 2020, and the first quarter of FY 2021, displaying variance data for First-Class Mail on a weekly basis disaggregated by product and service standard. Please disaggregate these data for each Postal Service geographic Area and the nation. Please report the data for up to 10 days extra or as many extra days as are necessary until 99 percent of the mail is accounted for.

RESPONSE:

The Excel spreadsheet entitled "FY20.ChIR.No.6.Question20Response.xlsx" is provided. Please note that the data sets start at 2/9/2019 because of data retention limitations. In all cases, the data readily available cover up to +15 days. In a few cases, the number of days until 99 percent of the mail is accounted for exceeded 15 days.