

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Periodic Reporting
(Proposal One)

Docket No. RM2021-3

PUBLIC REPRESENTATIVE MOTION
FOR ISSUANCE OF INFORMATION REQUEST

(March 24, 2021)

Proposal One consists of a number of planned changes to the Origin-Destination Information System – Revenue, Pieces, and Weight (ODIS-RPW) probability sampling system which is one of the various data sources used for the Postal Service’s regulatory reporting of revenue, pieces and weight. ¹ The Public Representative requests that an Information Request be issued to obtain additional information to more completely assess the impact of the ODIS-RPW changes on the quality, accuracy and completeness of the Postal Service data used in its Annual Compliance Report and contained in its annual periodic reports to the Commission. 39 C.F.R. § 3050.11(a).

1. The Postal Service states that the “ODIS-RPW primarily supplies official RPW estimates of revenue, piece and weight for single-piece stamped and non-PC Postage metered mail and services.” Proposal One at 2.
 - a. Please provide a complete list of the mail products and special services for which the ODIS-RPW “supplies official RPW estimates.”
 - b. Please confirm that for each of the mail products listed in subpart a. the ODIS-RPW is used to estimate the revenue, pieces and weight. If not confirmed,

¹ Petition of the United States Postal Service for the Initiation of a Proceeding to Consider Proposed Changes in Analytical Principles (Proposal One), March 11, 2021, Proposal One at 1-2 (Proposal One).

please explain for each, the estimation process and any other sources used to estimate revenue, pieces or weight.

2. The Postal Service states that “[t]he ODIS-RPW system is a probability-based destinating mail sampling system used to support the Postal Service’s many and varied business needs for revenue and pieces information.” *Id.*
 - a. Please specify what other data or systems typically reported or provided in the Postal Service’s Annual Compliance Report, would be impacted by the proposed changes to the ODIS-RPW system.
 - b. Please describe and provide any impact analysis of the affected data or system(s) listed in subpart a.
3. The second component (under the current and proposed methodology) of the ODIS-RPW is the digital sampling program. *Id.* at 5-6. Currently, the ODIS-RPW digital sample is also used to “enhance the estimation of [city carriers] delivered DPS volumes and replace a large portion of manual sampling of DPS letter trays by CCCS [City Carrier Cost System (CCCS)] data collectors.”²
 - a. Please explain how the ODIS-RPW digital sampling program is used to “enhance the estimation of delivered DPS volumes” in the CCCS.
 - b. Please distinguish the methodological and sampling differences between the use of the ODIS-RPW sample when it “primarily supplies” the data for an estimate³ and when it “enhance[s] the estimation” in the CCCS.⁴
 - c. Please specify the actual FY 2020 number of ODIS-RPW digital samples used to “enhance the estimation of delivered DPS volumes” in the CCCS.

² See Docket No. ACR2020, Library Reference USPS-FY20-34, December 29, 2020, PDF file “USPS-FY20-34_CCCS_Preface.pdf” at 27 (FY 2020 ACR Library Reference USPS-FY20-34).

³ Proposal One at 2.

⁴ FY 2020 ACR Library Reference USPS-FY20-34 at 27.

- d. Please specify the number of ZIP Codes included in the FY 2020 actual ODIS-RPW digital samples used to “enhance the estimation of delivered DPS volumes” in the CCCS.
 - e. Under the Proposal One reductions for the ODIS-RPW digital sampling program, how many ODIS-RPW digital samples would have been used in FY 2020 (if approved and implemented) to “enhance the estimation of delivered DPS volumes” in the CCCS.
 - f. Under the Proposal One reductions for the ODIS-RPW digital sampling program, please specify how many ZIP Codes would have been included in the FY 2020 reduced number of ODIS-RPW digital samples (if approved and implemented) to “enhance the estimation of delivered DPS volumes” in the CCCS.
 - g. Please describe the anticipated impact of the proposed reduction in the ODIS-RPW digital sample on the DPS volumes as estimated in the CCCS. Please include in your response any analysis related to changes in the quality, accuracy or reliability of the CCCS-ODIS-RPW digital sample estimated DPS volumes.⁵
 - h. Currently, for city letter routes in ZIP Codes not in the ODIS-RPW Digital frame, CCCS manual sampling of DPS mail at the route level is conducted.⁶ Please specify if the proposed reduction in the ODIS-RPW Digital sample will impact the number of routes DPS mail manually sampled in the CCCS. Please explain the basis or any related analysis supporting the response.
4. Currently, the Rural Carrier Cost System (RCCS) also “uses data from Origin-Destination Information System – Revenue, Pieces, and Weight (ODIS-RPW) digital samples destined for delivery by city [sic] carriers to enhance the estimation of delivered DPS volumes and replace a large portion of manual sampling of DPS letter trays by RCCS data collectors.”⁷

⁵ The Postal Service asserts that “[r]eductions in digital ODIS-RPW testing have limited impact due to the current highly efficient sample design and ratio estimator.” Proposal One at 12.

⁶ Docket No. ACR2018, Library Reference USPS-FY18-34, PDF file “USPS-FY18-34_CCCS_Preface.pdf” at 28.

⁷ Docket No. ACR2020, Library Reference USPS-FY20-35, December 29, 2020, PDF file “USPS-FY20-35_RCCS_Preface.pdf” at 11 (FY 2020 ACR Library Reference USPS-FY20-35).

- a. Please confirm that the quoted language relates to delivery by rural carriers.
- b. Please explain on how the ODIS-RPW digital sampling program is used to “enhance the estimation of delivered DPS volumes” in the RCCS.
- c. Please distinguish the methodological and sampling differences between the use of the ODIS-RPW sample when it “primarily supplies” the data for an estimate⁸ and when it “enhance[s] the estimation” in the RCCS.⁹
- d. Please specify the actual FY 2020 number of ODIS-RPW digital samples used to “enhance the estimation of delivered DPS volumes” in the RCCS.
- e. Please specify the number of ZIP Codes included in the FY 2020 actual ODIS-RPW digital samples used to “enhance the estimation of delivered DPS volumes” in the RCCS.
- f. Under the Proposal One reductions for the ODIS-RPW digital sampling program, how many ODIS-RPW digital samples would have been used in FY 2020 (if approved and implemented) to “enhance the estimation of delivered DPS volumes” in the RCCS.
- g. Under the Proposal One reductions for the ODIS-RPW digital sampling program, please specify how many ZIP Codes would have been included in the FY 2020 reduced number of ODIS-RPW digital samples (if approved and implemented) to “enhance the estimation of delivered DPS volumes” in the RCCS.
- h. Please describe the anticipated impact of the proposed reduction in the ODIS-RPW digital sample on the DPS volumes as estimated in the RCCS. Please include in your response any analysis related to changes in the quality, accuracy or reliability of the RCCS-ODIS-RPW digital sample estimated DPS volumes.¹⁰
- i. Currently, for rural routes in ZIP Codes not in the ODIS-RPW Digital frame, RCCS manual sampling of DPS mail at the route level is conducted.”¹¹ Please

⁸ Proposal One at 2.

⁹ FY 2020 ACR Library Reference USPS-FY20-35 at 11.

¹⁰ The Postal Service asserts that “[r]eductions in digital ODIS-RPW testing have limited impact due to the current highly efficient sample design and ratio estimator.” Proposal One at 12.

¹¹ FY 2020 ACR Library Reference USPS-FY20-35 at 11.

specify if the proposed reduction in the ODIS-RPW Digital sample will impact the number of routes DPS mail manually sampled in the RCCS. Please explain the basis and any related analysis supporting the response.

5. Under the current methodology, the ODIS-RPW digital sample appears to be the primary sample source (given the number of sample records in the SAS digital file) for the DPS volume delivered on rural carrier and city carrier letter routes.¹² Please confirm or explain why not, if applicable.
6. The Postal Service states under the “OBJECTIVE” section of the Petition Attachment that it is requesting “a change in methodology for estimating revenue, pieces, and weight for domestic products and services in the Revenue, Pieces and Weight (RPW) report. Petition Attachment at 1. Aside from its use as a data source for the RPW report, please specify and describe how (if applicable), the ODIS-RPW sampling program is currently used to enhance or develop other estimates (not already mentioned) in the Postal Service’s Annual Compliance Report.
7. One proposed ODIS-RPW sample design change includes a consolidation of sample areas, from one hundred-eighty-nine to ten. Petition Attachment at 16. Please describe the basis and methodology for the selection of the proposed ten sample areas.

Respectfully submitted,

Manon A. Boudreault
Public Representative

901 New York Avenue, N.W., Suite 200
Washington, DC 20268-0001
Phone (202) 789-6852
Email: manon.boudreault@prc.gov

¹² Commission analysis of the CCCS and RCCS digital and manual SAS data files included in Docket No. ACR2020, Library References USPS-FY20-34 and USPS-FY20-35, SAS data files “cccs_z_acr_fy20_final_pub.sas7bdat,” “cccs_z_acr_fy20_final_dig_pub.sas7bdat,” “rccs_z_acrfy20_final_pub.sas7bdat,” and “rccs_z_acr_fy20_final_dig_pub.sas7bdat.”

