

Before the
Postal Regulatory Commission
Washington, D.C. 20268–0001

Public Inquiry on Service
Performance Dashboard

Docket No. PI2022-2

Comments of the Lexington Institute
(March 18, 2022)

The Lexington Institute appreciates the opportunity to offer the following comments for the above referenced docket, specifically pertaining to Order No. 6104.

The Postal Regulatory Commission’s (PRC’s) plan to launch a service performance dashboard is an important and positive initiative. It has the potential to spur much greater media and public interest in key reporting data from the U.S. Postal Service (USPS). As such, this is in the public interest and clearly part of the PRC’s regulatory mission.

For the record, the PRC should have regular discussions about dashboards with the U.S. Postal Service’s Office of Inspector General, which recently launched dashboards based on quarterly reporting information.

The Postal Service Reform Act, which is expected to be signed into law soon, requires USPS to have a “Public Performance Dashboard” and that USPS specifically “develop and maintain a publicly available Website with an interactive web-tool that provides performance information for market-dominant products that is updated on a weekly basis.” It will also be important for the PRC to carefully monitor this dashboard. The PRC should be ready to challenge USPS on its data and related illustrations, while avoiding duplicated efforts in showcasing what the USPS will have on its dashboard.

The primary focus of PRC dashboard activities should be on documenting and promoting better understanding of delivery times for mail products. Service, rather than rates or the USPS's financial condition, is of the highest importance to Americans as seen from the more than 100,000 comments and statements received related to the mail service standards change in Docket No. N-2021-1.

The implementation of the lower service standards, which lengthens delivery times for 40 percent of first-class mail, merits continued in-depth scrutiny. USPS has consistently failed to meet the promised threshold of 95 percent on-time delivery under the reduced delivery standards.

It is also disconcerting that since October 1, 2021 USPS has said it will not meet the new standards for quite some time. For example, in USPS's [March 15, 2022 Reply Comments](#) in Docket No. ACR 2021 it says, "the Postal Service intends to transition to 95% over several years as the infrastructure and network changes necessary to achieve this performance are implemented."

The PRC should consider focusing its dashboard efforts on documenting these failed promises and stating in clear terms to the American people:

- How much longer, in terms of days, mail is now taking to be delivered in various areas of the country compared with mail delivery times in similar periods from fiscal years 2019-21.
- The volume of mail that is slower and the amount it has slowed relative to fiscal years 2019-21.
- The number of pieces of first-class mail that did not meet service times, in both absolute terms and relevant to the 95 percent on-time service standard that started October 1, 2021.
- To the extent possible, all mail products should be delineated and listed in this weekly dashboard information.

This information should be updated weekly. USPS, when it wants to and when the numbers are favorable, will put out such weekly news releases on service performance. As such, the information is readily available.

Thank you for your consideration and attention to these matters.

Respectfully,

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