

UNITED STATES OF AMERICA
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Periodic Reporting
(Proposal Six)

Docket No. RM2022-13

CHAIRMAN'S INFORMATION REQUEST NO. 1
AND NOTICE OF FILING UNDER SEAL

(Issued September 7, 2022)

To clarify the Postal Service's petition to consider proposed changes in analytical principles, filed August 26, 2022,¹ the Postal Service is required to provide written responses to the following questions. Answers should be provided to the individual questions as soon as they are developed, but no later than September 14, 2022.

1. Please see attachment filed under seal.
2. According to the Postal Service, under Proposal Six, "[g]oing forward, updates to the sampling program would . . . include more tests to lower CVs [coefficients of variation], as well as modifications to the frame design process." Petition, Proposal Six at 6. Please identify and describe in detail each modification to the frame design process that the Postal Service proposes in Proposal Six.
3. The Postal Service states that "[a]nalysis of the best suitable frame design using various available trip data led to the use of late October and early November trip data to provide the initial peak frame." *Id.*
 - a. Please explain in detail why the Postal Service proposes using late October and early November trip data to provide the initial peak frame.

¹ Petition of the United States Postal Service for the Initiation of a Proceeding to Consider Proposed Changes in Analytical Principles (Proposal Six), August 26, 2022 (Petition).

- b. Please explain in detail why the Postal Service does not propose using November and December trip data to provide the initial peak frame, when the Postal Service used such data in its fiscal year (FY) 2021 and 2022 studies. *See id.* at 3.
4. The Postal Service states that, in the FY 2022 peak season, “further instructions were provided to the DCTs [data collection technicians], emphasizing the importance of finding replacement trips to test if the originally selected test did not operate as planned.” *Id.* at 4.
 - a. Please provide the instructions provided to the DCTs to determine the replacement trips.
 - b. Please describe in detail how the DCTs conducted such test(s), including all testing procedures applied in such test(s).
5. The Postal Service proposes increasing the number of peak tests to 300. *Id.* at 5-6. The Postal Service further states that “these tests would be systematically randomly selected from the full list of peak trips[.]” *Id.* If DCTs are instructed to locate replacement peak trips, will the randomness of the initial selection be maintained when replacing trips?
 - a. If yes, please explain how the randomness of the initial selection will be maintained when replacing trips.
 - b. If no, please answer the following subparts:
 - i. Please explain why not.
 - ii. Please provide alternative replacement instructions that will maintain random selection.
6. The Postal Service states that, “[t]his study yielded 38 tests out of 48 with meaningful data, allowing a distribution key to be developed.” *Id.* at 4.
 - a. Please explain why 10 of the tests did not produce meaningful data.

- b. Please explain the bearing that the number of FY 2022 tests without meaningful data will have on the Postal Service's proposal to expand the number of tests to 300.
7. The Postal Service states that FY 2022 Quarter 2 through Quarter 4 experience "very small amount[s] of costs accrued in peak highway accounts" which make it not "feasible to sample these trips[.]" *Id.* at 7.
 - a. Please provide a table of the costs (similar in format to Table 1 in Proposal Six) for each fiscal quarter of FY 2022 Quarter 2 through Quarter 4 to support this assertion.
 - b. Please explain in detail why, in the Postal Service's view, limited amounts of costs make sampling peak highway costs infeasible for FY Quarter 2 through FY Quarter 4.
 - c. Does the Postal Service anticipate proposing to enhance FY Quarter 2 through FY Quarter 4 peak highway transportation cost distribution in a future docket? If so, please explain.

By the Chairman.

Michael Kubayanda