

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

Periodic Reporting of Service Performance)
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Docket No. RM2022-7

**COMMENTS OF NEWS/MEDIA ALLIANCE
IN RESPONSE TO NOTICE OF PROPOSED RULEMAKING
TO REVISE PERIODIC REPORTING OF SERVICE PERFORMANCE**

(October 31, 2022)

The News/Media Alliance (“N/MA”) respectfully submits these comments to the proposed rules published by the Commission regarding periodic service reporting pursuant to Commission Order No. 6275.¹

N/MA is the leading association representing newspaper and magazine publishers that collectively generate more than \$40 billion in annual revenue. As we and our predecessor organizations have explained in other service-related Commission dockets,² our members and their customers rely on the Postal Service for the timely delivery of news and information nationwide, including time-sensitive daily and weekly publications. Accurate, useful, robust, and transparent USPS service performance data is thus important to our members and is in the public interest.

N/MA generally supports the proposed rules; however, we do offer some proposed recommendations. Overall, the Commission’s proposals will enhance the utility and transparency of the Postal Service’s periodic service performance reports for

¹ See Notice of Proposed Rulemaking, 87 Fed. Reg. 59363-59370 (Sept. 30, 2022).

² See *generally* News/Media Alliance Statement of Position, Docket No. N2022-2 (October 21, 2022); Reply Comments of the News Media Alliance, Docket No. PI2022-3 (June 3, 2022); Comments of MPA – The Association of Magazine Media, Docket No. PI2022-3 (May 18, 2022).

mailers and the general public. We believe that several proposals are particularly laudable and should be preserved when the Commission promulgates final rules, including: (1) the requirement that the Postal Service present service performance results for each ZIP Code, District, and Area; (2) the requirement that the Postal Service report actual delivery days in addition to reporting on-time delivery percentages (which is a less useful metric); (3) the requirement that the Postal Service report point impact data for the root causes of on-time performance failures; (4) the implementation of reporting requirements for mail excluded from measurement; and (5) the separate reporting of nonprofit and commercial service performance within the Periodicals and Marketing Mail classes.

N/MA suggests that certain modifications to the proposed rules would further enhance service performance reporting for mailers and the public:

- *Reporting requirements for point impact data should emphasize quality over quantity.* The proposal to be codified at 39 C.F.R. § 3055.22 would require the Postal Service to, “[f]or each product within the Periodicals class that does not meet its service goal during the reporting period, report the point impact data for the top ten root causes of on-time service performance failures....”

N/MA agrees that reporting on the root causes of service performance failures can be useful in helping mailers, the Postal Service, and the Commission identify underperforming components within the mailstream. However, unless these data are actually used to improve service performance or reduce USPS costs, their utility will be diminished.

Therefore, N/MA recommends that the final rules lower the reporting burden for service failures on the Postal Service and require point impact data only to the extent such data can be used for operational or delivery improvement. Mailers would greatly prefer for the Postal Service to focus on solving a manageable number of problems rather than on creating lists containing too many items to address. Changing the requirement that the Postal Service report the point impact data from a “top ten” list to “no less than three (3)” root causes should suffice.

- Reporting on average actual delivery days should reflect wait times for drop-shipped mail. N/MA agrees with the Commission that actual delivery days is a more useful service performance metric than is percentage of on-time delivery. Thus, we generally support the concept that these data be included in the Postal Service's periodic reports.

The proposed rules define "actual delivery days" as "all days in which Market Dominant products are eligible for delivery, excluding Sundays and holidays."³ However, we believe this proposal is ambiguous, and the Commission should clarify the time period that is covered by an actual delivery day. More specifically, we believe the measurement of the actual delivery days required for a mail piece should include wait times.

Our members report to us that they experience significant wait times for drop-shipped appointments, including the time that elapses from driver check-in to parking at the unloading dock and from the start to the end of unloading.⁴ The exclusion of wait times will distort the service performance data by potentially reducing the "actual delivery days" being measured and reported. N/MA recommends including wait times to render the reported data more accurate and transparent.

- Mail not in measurement. Given the large volume of Periodicals currently not in measurement, N/MA commends the Commission's proposal to have the Postal Service report mail excluded from measurement, disaggregated by the reason(s) for exclusion, and mail volumes measured and unmeasured by Full Service Intelligent Mail barcode.

Beyond merely measuring and reporting on the mail – particularly within the Periodicals class – that is excluded from measurement, N/MA urges the Commission to require that the Postal Service develop a plan to increase the volume of mail in measurement. We recommend that the Commission require the Postal Service to submit such a plan to the Commission within 180 days of publication of the final rules, and that the plan be subject to notice and public comment before it is implemented.

- The Public Dashboard Should Include Container Scanning Performance Data. We would like to see the Commission require the Postal Service to report on the USPS's container scanning performance – ideally, by facility with the ability to aggregate up to the area/district level – as each site has a unique facility ID tied to its scanners. We believe that the Postal Service would be able to do this without undue burden (it already scans trays and containers in other contexts), and that container scan data would enhance the value of the performance dashboard.

³ See 87 Fed. Reg. 59369 (proposed 39 C.F.R. § 3055.100(a)).

⁴ See News/Media Alliance Statement of Position, Docket No. N2022-2 (October 21, 2022) at 7.

- *The Public Dashboard Should Be Interactive.* N/MA is very supportive of the publicly available online “dashboard” as a transparency tool; however, we recommend that it also include ways for our members and the public to communicate questions, comments, or concerns.

N/MA appreciates the opportunity to comment on these proposed rules and your further consideration of our recommendations.

Respectfully submitted,

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