

UNITED STATES OF AMERICA  
Before The  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

Postal Rate and Fee Changes, 2001 )

Docket No. R2001-1

OFFICE OF THE CONSUMER ADVOCATE  
INTERROGATORIES TO UNITED STATES POSTAL SERVICE  
(OCA/USPS-1-21)  
September 28, 2001

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Pursuant to Rules 25 through 28 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents.

If data requested are not available in the exact format or level of detail requested, any data available in (1) a substantially similar format or level of detail or (2) susceptible to being converted to the requested format and detail should be provided.

The production of documents requested herein should be made by photocopies attached to responses of these interrogatories. If production of copies is infeasible due to the volume of material or otherwise, provision should be made for inspection of responsive documents at the Office of the Consumer Advocate, 1333 H Street, N.W., Washington, D.C. 20268-0001, during the hours of 8:00 a.m. to 4:30 p.m.

If a privilege is claimed with respect to any data or documents requested herein, the party to whom this discovery request is directed should provide a Privilege Log (see, e.g., Presiding Officer Ruling C99-1/9, p. 4, in *Complaint on PostECS*, Docket No.

C99-1). Specifically, “the party shall make the claim expressly and shall describe the nature of the documents, communications, or things not produced or disclosed in a manner that, without revealing information itself privileged or protected, will enable other parties to assess the applicability of the privilege or protection.” Fed. R. Civ. P. 26(b)(5).

The term “documents” includes, but is not limited to: letters, telegrams, memoranda, reports, studies, newspaper clippings, speeches, testimonies, pamphlets, charts, tabulations, and workpapers. The term “documents” also includes other means by which information is recorded or transmitted, including printouts, microfilms, cards, discs, tapes and recordings used in data processing together with any written material necessary to understand or use such punch cards, discs, tapes or other recordings.

“All documents” means each document, as defined above, that can be located, discovered or obtained by reasonable diligent efforts, including without limitation all documents possessed by: (a) you or your counsel; or (b) any other person or entity from whom you can obtain such documents by request or which you have a legal right to bring within your possession by demand.

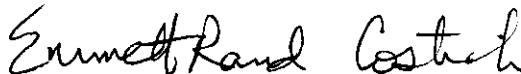
“Communications” includes, but is not limited to, any and all conversations, meetings, discussions and any other occasion for verbal exchange, whether in person or by telephone, as well as all documents, including but not limited to letters, memoranda, telegrams, cables, or electronic mail.

“Relating to” means discussing, describing, reflecting, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part.

Responses to requests for explanations or the derivation of numbers should be accompanied by workpapers. The term "workpapers" shall include all backup material whether prepared manually, mechanically or electronically, and without consideration to the type of paper used. Such workpapers should, if necessary, be prepared as part of the witness's responses and should "show what the numbers were, what numbers were added to other numbers to achieve a final result." The witness should "prepare sufficient workpapers so that it is possible for a third party to understand how he took data from a primary source and developed that data to achieve his final results." Docket No. R83-1, Tr. 10/2795-96. Where the arithmetic manipulations were performed by an electronic digital computer with internally stored instructions and no English language intermediate printouts were prepared, the arithmetic steps should be replicated by manual or other means.

Please especially note that if you are unable to provide any of the requested documents or information, as to any of the interrogatories, provide an explanation for each instance in which documents or information cannot be or have not been provided.

Respectfully submitted,



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OCA/USPS-1. In First-Class Letters and Sealed Parcels, Regular, please confirm that there is substantial averaging of costs by shape (i.e., letter-shaped, flat-shaped, and nonletter/nonflat-shaped). If you do not confirm, please explain.

OCA/USPS-2.

- (a) Please confirm that shape (i.e., letter-shaped, flat-shaped, and nonletter/nonflat-shaped) is a cost-driving factor in First-Class Letters and Sealed Parcels, Automation-Presort. If you do not confirm, please explain.
- (b) Please confirm that shape is a cost-driving factor in First-Class Letters and Sealed Parcels, Regular. If you do not confirm, please explain.
- (c) Please confirm that shape should be recognized in the rate structure of First-Class Letters and Sealed Parcels, Regular. If you do not confirm, please explain.
- (d) Please confirm that a more complex rate design (different rates for each weight/shape cell) for pieces weighing over one ounce would more closely align costs with rates. If you do not confirm, please explain.

OCA/USPS-3. In the First-Class Letters and Sealed Parcels subclass,

- (a) Please confirm that the additional ounce rate is designed, in part, to cover the additional costs associated with the processing and handling of nonstandard letters weighing more than one ounce. If you do not confirm, please explain.
- (b) Please confirm that the additional ounce rate is designed, in part, to cover the additional costs associated with the processing and handling of flat-shaped and nonletter/nonflat-shaped mail. If you do not confirm, please explain.

OCA/USPS-4. In the First-Class Letters and Sealed Parcels subclass,

- (a) Please confirm that as the weight of mail increases, the proportion of letter-shaped pieces decreases and the proportion of flat-shaped and nonletter/nonflat shaped pieces increases. If you do not confirm, please explain.
- (b) Please confirm that flat-shaped pieces are more costly to process and handle than letter-shaped pieces, and nonletter/nonflat-shaped pieces are more costly to process and handle than flat-shaped pieces. If you do not confirm, please explain.

OCA/USPS-5. For First-Class 1) letters, 2) flats, and 3) nonletters/nonflats, please provide the manufacturer specified minimum and maximum length, height, weight, thickness and aspect ratio standards for any processing equipment to be deployed by the Postal Service through the test year.

OCA/USPS-6. Please refer to the testimony of Linda A. Kingsley (USPS-T-39) at page 2, lines 4-5.

- (a) Please define the term mailstream.
- (b) Is shape the defining characteristic of Postal Service processing mailstreams? Please explain.
- (c) Please confirm that there are only three distinct processing mailstreams, e.g., letters, flats and parcels. If you do not confirm, please explain.

- (d) Is manual processing considered a separate mailstream? Is manual processing of letters, flats and parcels considered three separate mailstreams? Please explain.
- (e) Is the processing of bundles, sacks and trays considered three separate mailstreams? Please explain.
- (f) Is Priority Mail considered a separate mailstream? Please explain.

OCA/USPS-7. The following interrogatory refers to a case study, "Pushing the Envelope, The U.S. Postal Service Digs Deep To Deliver What Customers Really Want," by Francina Smith, Lizbeth Dobbins, and Janet Tonner. A copy of the article is attached. The case study indicates that "Postal Service managers have access to as many as 180,000 business-satisfaction surveys and 200,000 residential surveys every three months. And while customer satisfaction surveys have been around for a long time, what makes these different – and a great model for any service company – is that the results are linked by ZIP Code to precise locations and operations at the Postal Service."

- (a) Please provide copies of the 180,000 business-satisfaction surveys and 200,000 residential surveys that are performed every three months.
- (b) For each year and each three month period in FY 2000 and FY 2001, please provide by postal region, a copy of the survey results referred to in the case study.

OCA/USPS-8. Please refer to the testimony of Linda A. Kingsley (USPS-T-39) at pages 9 and 10, lines 21-30, and 1-9, respectively.

- (a) For each bulleted item, (i) give an example, (ii) provide the volume, or an estimate of the volume, or a percentage of the manual letter-shaped volume, and (iii) the unit cost of processing.
- (b) Bullet six identifies nonmachinable letter-shaped mailpieces that do not bend in transport. Are there other types of letter-shaped mailpieces processed manually because of problems in transport (e.g., glossy envelopes)? Please explain.
- (c) Has the Postal Service become aware of any other examples of nonmachinable letter-shaped mailpieces since the preparation of her testimony?

OCA/USPS-9. Please refer to the testimony of Linda A. Kingsley (USPS-T-39) at page 5, footnote 9. Please confirm that the increase from 68 percent currently to an expected 93 percent in FY 03 is reflected in the roll forward. If you do not confirm, please explain.

OCA/USPS-10. Please refer to the testimony of Linda A. Kingsley (USPS-T-39) at page 11, lines 14-15.

- (a) Please confirm that 8.9 percent of all letters in AP12, FY 01 did not have 9- or 11-digit barcodes. If you do not confirm, please explain.
- (b) Please confirm that the 8.9 percent of all letters not barcoded to nine or eleven digits are processed manually. If you do not confirm, please explain.

- (c) Please identify what factors are preventing the 8.9 percent of all letters not currently barcoded from being barcoded, and describe how the Postal Service plans to have barcodes applied to these letters.

OCA/USPS-11. Please refer to the testimony of witness Linda A. Kingsley (USPS-T-39) at page 23, lines 11-12, which states that the Linear Integrated Parcel Sorters (LIPS) machine "is not part of a national program and is procured locally."

- a. Please identify all processing equipment "not part of a national program" that is used in the processing of First-Class Mail.
- b. For each piece of processing equipment identified in part (a) of this interrogatory, please provide the manufacturer specified minimum and maximum length, height, weight, thickness and aspect ratio standards for 1) letters, 2) flats, and 3) nonletters/nonflats.

OCA/USPS-12. Please refer to the testimony of Michael Miller (USPS-T-22), and USPS LR-J-60, Part A., "First-Class Mail Letters/Cards." There are 17 cost model spreadsheets for letters/cards: First-Class Single-Piece Handwritten Letters; First-Class Single-Piece QBRM Letters; First-Class Single-Piece Metered Letters; First-Class Mail Nonauto Machinable Mixed Mix AADC/AADC Presort Letters; First-Class Mail Nonauto Machinable 3-Digit Presort Letters; First-Class Mail Nonauto Nonmachinable MACD Presort Letters; First-Class Mail Nonauto Nonmachinable ADC Presort Letters; First-Class Mail Nonauto Nonmachinable 3-Digit Presort Letters; First-Class Mail Nonauto Nonmachinable 5-Digit Presort Letters; First-Class Mail Auto Mixed Mix AADC Presort



Letters; First-Class Mail Auto Presort Letters; First-Class Mail Auto 3-Digit Presort Letters; First-Class Mail Auto 5-digit Presort Letters (Other Sites); First-Class Mail Auto 5-Digit Presort Letters (CSBCS/Manual Sites); First-Class Mail Auto Carrier Route Presort Letters; First-Class Mail Nonstandard Single-Piece Letters; and, First-Class Mail Nonstandard Presort Letters. Each cost model spreadsheet identifies the following operations: Entry Activities; Outgoing RBCS; Outgoing Primary; Outgoing Secondary; Incoming RBCS; Incoming MMP; Incoming SCF/Primary; 5-Digit Barcode Sort; and Incoming Secondaries.

- (a) Please identify each piece of mail processing equipment for each operation in the 17 cost model spreadsheets.
- (b) For each piece of mail processing equipment identified in response to part (a), please provide the manufacturer specified minimum and maximum length, height, weight, thickness and aspect ratio standards for First-Class letter-shaped mail.
- (c) Please identify all instances where the manufacturer specified minimum and maximum length, height, weight, thickness and aspect ratio standards for First-Class letter-shaped mail provided in response to part (b) are greater than the standards for First-Class letter-shaped mail contained in the DMCS and DMM.
- (d) Please confirm that the 17 cost model spreadsheets represent different mailstreams for the processing of all letter-shaped First-Class Mail. If you do not confirm, please explain and identify all mailstreams for the processing of letter-shaped First-Class Mail.

OCA/USPS-13. Please refer to the testimony of Michael Miller (USPS-T-24), and USPS LR-J-61, Part A., "First-Class Mail Flats." There are nine cost model spreadsheets for flats: Nonauto Presort; Mixed ADC Nonauto Presort; ADC Nonauto Presort; 3-Digit Nonauto Presort; 5-Digit Nonauto Presort; Mixed MADC Auto Presort; ADC Auto Presort; 3-Digit Auto Presort; 5-Digit Auto Presort. Each cost model spreadsheet identifies the following operations: Outgoing primary (Package); Incoming MMP (Package); Incoming Primary (Package); Incoming Secondary (Package); Outgoing Primary (Piece); Outgoing Secondary (Piece); Incoming MMP (Piece); Incoming SCF (Piece); Incoming Primary (Piece); and, Incoming Secondary (Piece).

- (a) Please identify each piece of mail processing equipment for each operation in the 9 cost model spreadsheets.
- (b) For each piece of mail processing equipment identified in response to part (a), please provide the manufacturer specified minimum and maximum length, height, weight, thickness and aspect ratio standards for First-Class flat-shaped mail.
- (c) Please identify all instances where the manufacturer specified minimum and maximum length, height, weight, thickness and aspect ratio standards for First-Class flat-shaped mail provided in response to part (b) are greater than the standards for First-Class flat-shaped mail contained in the DMCS and DMM.
- (d) Please confirm that the nine cost model spreadsheets represent different mailstreams for the processing of all flat-shaped First-Class Mail. If you do not confirm, please explain and identify all mailstreams for the processing of flat-shaped First-Class Mail.

OCA/USPS-14. Please provide a copy of the USPS window clerk training manual. Include in your response all information, scripts, and other material developed to implement the Postal Service's "greet, inquire, suggest, thank (GIST) system of quality retail service." See Docket No. R2000-1, USPS-LR-I-200 at 3.

OCA/USPS-15. Please provide tabulations of **total base-year revenue and volume-variable costs** by the following categories of **First-Class Letters and Sealed Parcels**. If data for some cells of the tabulations are not available, please provide the most recent available data for as many cells as possible. If any of the requested information has already been filed, please provide a citation (by tabulation cell) to document title, page number, line number, and column number. This information is sought for use in preparation of the OCA's direct case. Accordingly, it is not directed to any particular witness.

- (a) All mail.
- (b) Please provide a break-down of the response to Part **a** of this interrogatory by shape (*i.e.*, by letter-shaped mail, flat-shaped mail, and non-letter/non-flat mail).
- (c) Please provide a break-down of the response to Part **b** of this interrogatory on the basis of whether mail is subject to the non-standard surcharge.
- (d) Please provide a break-down of the response to Part **c** of this interrogatory by whether mail is discounted.
- (e) Please provide a break-down of the response to Part **d** of this interrogatory by whether mail is automation compatible.

- (f) Please provide a break-down of the response to Part **b** of this interrogatory by whether mail is discounted.
- (g) Please provide a break-down of the response to Part **b** of this interrogatory by whether mail is automation compatible.
- (h) Please provide a break-down of the response to Part **f** of this interrogatory by whether mail is automation compatible.
- (i) Please provide a break-down of the response to Part **g** of this interrogatory by whether mail is discounted.
- (j) Please provide a break-down of the response to Part **h** of this interrogatory on the basis of whether mail is subject to the non-standard surcharge.
- (k) Please provide a break-down of the response to Part **i** of this interrogatory on the basis of whether mail is subject to the non-standard surcharge.

OCA/USPS-16. Please provide tabulations of total **test-year** revenue and volume-variable costs on the bases requested in Interrogatory OCA/USPS-15. This information is sought for use in preparation of the OCA's direct case. Accordingly, it is not directed to any particular witness.

OCA/USPS-17. Please provide tabulations of **base-year rates (or average revenue per piece) and unit volume-variable costs** for the categories of First-Class Letters and Sealed Parcels on the bases requested in interrogatory OCA/USPS-15. This information is sought for use in preparation of the OCA's direct case. Accordingly, it is not directed to any particular witness.

OCA/USPS-18. Please provide **test-year** rates (or average revenue per piece) and unit volume-variable costs for the categories of First-Class Letters and Sealed Parcels on the bases requested in interrogatory OCA/USPS-15. This information is sought for use in preparation of the OCA's direct case. Accordingly, it is not directed to any particular witness.

OCA/USPS-19. Please provide the tabulations requested in interrogatories OCA/USPS-15-18 separately for First-Class **Cards, Post Cards, and Postal Cards**. This information is sought for use in preparation of the OCA's direct case. Accordingly, it is not directed to any particular witness.

OCA/USPS-20. Please provide a tabulation of **base-year volumes of First-Class Letters and Sealed Parcels** by ounce increment by shape (*i.e.*, letter-shaped mail, flat-shaped mail, and non-letter/non-flat mail). This information is sought for use in preparation of the OCA's direct case. Accordingly, it is not directed to any particular witness.

OCA/USPS-21. Please refer to the response of the Postal Service to interrogatory DBP/USPS-22 in Docket No. C2001-1, September 10, 2001. The Postal Service states,

[T]echnology resources affecting the ability to meet the outgoing processing workload have changed materially in recent years. Improvements in equipment capabilities, such as handwriting recognition, have enhanced the Postal Service's ability to process outgoing letter-shaped mail, of which the vast majority of collection mail consists. The achieved throughputs on the equipment have increased, with the result that the capacity exists to handle more collection mail within a shorter operating window. Emblematic of these changes in the operating

environment over the last several years has been the Postal Service's ability to send less mail to the Remote Encoding Centers, and, in fact, to begin closing RECs over this period.

- (a) Please identify all "improvements in equipment capabilities" that occurred between the base year in R2000-1 and the base year in this docket.
- (b) Please identify all "improvements in equipment capabilities" that occurred in FY 2001.
- (c) Please identify all "improvements in equipment capabilities" that the Postal Service expects will occur between the base year and the test year of this docket. Please provide citations to roll-forward documentation showing how the "improvements in equipment capabilities" translate into reduced expenses in the test year.
- (d) Please provide citations to roll-forward documentation showing how improvements in "handwriting recognition" translate into reduced expenses in the test year.
- (e) Please provide the change in cost avoidance between the base years of R2000-1 and this docket, for each worksharing discount in First-Class Mail, resulting from improvements in "handwriting recognition."
- (f) Please provide the proportion and absolute volume of handwritten First-Class letter-shaped mail that was successfully barcoded by "handwriting recognition" equipment in the most recent AP, quarter, and fiscal year for which data are available.

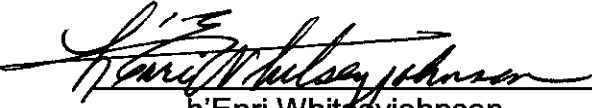
- (g) Please provide the proportion and absolute volume of handwritten First-Class letter-shaped mail that is projected to be successfully barcoded by “handwriting recognition” equipment in the test year of this docket.
- (h) Please provide the proportion and absolute volume of handwritten First-Class card-shaped mail that is projected to be successfully barcoded by “handwriting recognition” equipment in the test year of this docket.

OCA/USPS-21. Please provide the following information for Priority Mail for the most recent year-long period available. If some of the requested data are only available for a shorter period, please provide the data for the longest possible period.

- (a) Volume by weight increment (please treat flat rate separately) by shape (*i.e.*, by letter-shaped mail, flat-shaped mail, and non-letter/non-flat mail).
- (b) The volume data requested in Part a of this interrogatory further broken down by presort level.
- (c) Proportion and absolute volume that receives its first sort on flat sorting equipment, by weight increment (please treat flat rate separately) by shape (*i.e.*, by letter-shaped mail, flat-shaped mail, and non-letter/non-flat mail).
- (d) The volume data requested in Part c of this interrogatory further broken down by whether the Postal Service applies a bar code.
- (e) The volume data requested in Part c of this interrogatory further broken down by whether the mailer applies a bar code.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with Rule 12 of the rules of practice.

  
Henri Whitsy Johnson

Washington, D.C. 20268-0001  
September 28, 2001



CASE STUDY

# PUSHING THE ENVELOPE

THE U.S. POSTAL SERVICE DIGS DEEP TO  
DELIVER WHAT CUSTOMERS REALLY WANT.

[ BY FRANCIA SMITH, LIZBETH DOBBINS AND JANET TONNER ]

A company that handles 200 billion pieces of mail a year faces an awesome customer service challenge. For the U.S. Postal Service, that challenge has never been so critical—or daunting. Now a self-supporting, independent federal agency, it must compete with companies such as FedEx, Airborne Express and United Parcel Service. Meanwhile, experts expect that electronic mail and online services will take their toll on First-Class deliveries—the most profitable service. Simply put, it has never been more important for the Postal Service to be efficient, innovative and, above all, customer friendly if it hopes to stay competitive.

Transforming an organization as vast as the Postal Service from an operations-oriented company to a customer-oriented one doesn't happen overnight. The Postal Service remains the largest mail service in the world, with more than 38,000 post offices, stations and branches and close to 800,000 employees. What's more, it continues to unveil offerings, such as its online bill-payment system and a service that prints and mails electronic documents. And it has been investing resources in hardware and software—including a recent agreement with NCR Corp. to develop an inventory tracking system—designed to boost

customer service. But it is the sheer size of the Postal Service, combined with its huge variety of offerings, that has long made it difficult to link customer-satisfaction data to specific operations, postal centers and people so that something can be done to fix problems and increase customer satisfaction.

Now, technology has provided a solution. A new Web-based reporting system, developed in concert with The Gallup Organization, provides that linkage, because of the system, Postal Service managers have access to as many as 180,000 business-satisfaction surveys and 200,000 resi-

dential surveys every three months. And while customer satisfaction surveys have been around for a long time, what makes these different—and a great model for any service company—is that results are linked by ZIP Code to precise locations and operations at the Postal Service. Rather than generating vast amounts of data that are difficult to apply to problem areas, Postal Service managers can now pinpoint such problems as a neighborhood experiencing late deliveries and actually do something to fix them. Even better, managers can learn from each other by using the system to research "best practices" in customer service.



MICHAEL F. FUREY MADE CUSTOMERS  
HAPPY IN BALTIMORE

FRANCIA SMITH IS VICE PRESIDENT AND CONSUMER ADVOCATE FOR THE UNITED STATES POSTAL SERVICE. SHE IS ALSO AN EXECUTIVE BOARD MEMBER OF THE POSITIVE PSYCHOLOGY SUMMIT, COSPONSORED BY THE GALLUP ORGANIZATION. LIZBETH DOBBINS IS MANAGER OF CUSTOMER SATISFACTION MEASUREMENT FOR THE USPS, AND JANET TONNER IS A USPS CONSUMER RESEARCH ANALYST.

So that field managers can drill down to a specific postal district or office, the reports are broken down into what the Postal Service calls attributes—such things as delivery times or the condition of a postal lobby. Residential customers will, for instance, be asked whether post office employees greeted them pleasantly, asked the right questions to find out what the customer needed, and even whether they said “thank you.” The results are then mapped electronically by ZIP Code to reveal areas where customer satisfaction needs improvement.

That’s not all. Results are then linked to Postal Service internal process indicators such as mail transit time. So, for example, if a survey reveals inconsistent delivery times in a particular district, the system shows whether carriers are late leaving the post office in the morning. The combined results—including overall scores for Postal Service performance—are then posted onto the Postal

## MANAGERS

can learn from each other by using the new Web-based reporting system to research “best practices” in customer service.

Service intranet, helping managers search for the causes of late deliveries and other problems.

That’s exactly how Margaret Romero, former manager of consumer affairs in Albuquerque, N.M., solved a late-delivery problem affecting senior citizens in a retirement home. The residents had expressed their concerns to their local post office about a magazine that was arriving a day later than usual. Romero used the system to search mail routing information and found nothing out of place. So she knew the problem had to be with the publisher. Sure enough, the magazine’s production schedule had changed, and Romero relayed that information to the home’s residents. Though that problem may seem minor, late deliveries rate very high on Postal Service customer satisfaction surveys, so it is important that they be corrected quickly.

Another example: Michael F. Furey, former postmaster of Baltimore, Md., used the reporting system to raise customer satisfaction in that city. Surveys revealed that customers were concerned about long waits and existing retail hours at postal windows. Furey used the system to select certain post offices—specifically, those in areas reporting the lowest customer satisfaction—where window



MARGARET ROMERO FINPOINTED A LATE-DELIVERY PROBLEM.

hours could be extended in the morning and evening. Now the district manager for customer service and sales in northern Virginia, Furey plans to use Web-based reporting there as well. In fact, the Postal Service expects the system to play a major role in raising customer satisfaction to 94% nationwide, up from as low as 85% in the early 1990s.

Granted, before the system was put in place, the Postal Service was able to collect customer satisfaction data and use it to pinpoint regions that needed improvement. But interpretations of that data were subjective. Because data could not be linked directly to specific facets of postal operations, such as the time of day postal carriers actually deliver the mail, postal managers had no way of identifying a problem’s source.

What makes the Web-based reporting system so valuable is that it has eliminated that guesswork and provides a clearer picture of service problems. More importantly, though, the system has proven to field managers that they do have control over customer satisfaction. “It helps us identify more specifically what the issues are, and enables us to fix the root cause of the problem,” says Furey. “Having that data is empowering.” It has also, the Postal Service believes, put smiles on the faces of its employees, boosted its image among postal customers and enabled it to deliver truly first-class service. †