

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

POSTAL RATE AND FEE CHANGES  
PURSUANT TO PUBLIC LAW 108-18

Docket No. R2005-1

RESPONSES OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE  
(OCA/USPS-102-105, 107-110, 112-117)  
(June 15, 2005)

The United States Postal Service hereby provides its institutional responses to interrogatories OCA/USPS-102-105, 107-110, 112-117, submitted on June 1, 2005.

Responses to interrogatories OCA/USPS-106, 111 and 118 are forthcoming.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,  
UNITED STATES POSTAL SERVICE

By its attorneys:

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**OCA/USPS-102.** Please refer to the response to DBP/USPS-48, regarding Registered Mail, where it states, in part, “The number of claims, the number of claims paid, and the dollar amount paid for claims do not exactly match the numbers provided in response to DFC/USPS-23 because the response to this interrogatory [DBP/USPS-48] is based on data relating to claims accepted in a fiscal year while the earlier response [to DFC/USPS-23] used data that tracked claims resolved in a fiscal year.” Also, please refer to Pages 2 and 3 of the Attachment to DBP/USPS-48. For FY 2000 through FY 2003, please provide number of “Claims Paid” by value category, and the amount of “claims resolved in a fiscal year” by value category.

**RESPONSE:**

The “Claims Paid” data by category for FY 2002 was presented in the response to DBP/USPS-48, while similar data was provided in FY 2000 and FY 2001 in the response to OCA/USPS-62.

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**OCA/USPS-103.** Please refer to the response to OCA/USPS-10(a), which states, in part, "The Sunday/holiday exclusion does not apply to certain Express Mail pieces." Please confirm that the Sunday/holiday exclusion does not apply to Next Day Express Mail delivered to 13,928 ZIP Codes nationwide. If you do not confirm, please explain.

**RESPONSE:**

Confirmed that the Postal Service delivers Express Mail to 13,928 ZIP Codes nationwide on Sundays and holidays.

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**OCA/USPS-104.** Please refer to the response to OCA/USPS-11(b)-(c), which states, “Confirmed that the ODIS Quarterly Statistics Reports do not address levels of achieved performance for overnight and second day Express Mail. See the response to DFC/USPS-5.” Please confirm that the reference to “DFC/USPS-5” should be “DFC/USPS-6”. If you do not confirm, please explain.

**RESPONSE:**

Confirmed. Appropriate erratum will be filed.

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**OCA/USPS-105**

Please refer to the response to OCA/USPS-18, and USPS-LR-K-82.

- a. Refer to the response to OCA/USPS-18(a), which references DFC/USPS-5 and 7. Other than PETE or ODIS, please identify any other data or measurement system that provides the average number of days to delivery for the mail classes and groups listed in Table 4 of USPS-LR-K-82, and provide the average number of days to delivery for the mail classes and groups listed from such data or measurement systems. If PETE and ODIS are the only data or measurement systems providing this information for the mail classes and groups listed in Table 4 of USPS-LR-K-82, please identify PETE and ODIS as such.
- b. Refer to the response to OCA/USPS-18(b), which references DFC/USPS-5 and 7. Please identify any data or measurement system other than ODIS that provides the percentage of mail delivered for Day 1 through Day 10 for each of the mail classes and groups listed in Table 4 of USPS-LR-K-82, and provide the required percentages from such data or measurement systems. If ODIS is the only data or measurement system, please identify ODIS as such.
- c. Refer to the response to OCA/USPS-18(c). Please identify any data or measurement system other than ODIS that permits comparison of First-Class Mail and Priority Mail in terms of the percentage of mail delivered for Day 1 through Day 10, and provide the required percentages from such data or measurement systems. If ODIS is the only data or measurement system, please identify ODIS as such.
- d. Refer to the response to OCA/USPS-18(d), which references DFC/USPS-5 and 7. Please identify any data or measurement system other than ODIS that provides the percentage of intra-P&DC and inter-P&DC volume, and the average number of days to delivery for such volume, for each of the mail classes and groups listed in Table 5 of USPS-LR-K-82, and provide the required percentages and average number of days from such data or measurement systems. If ODIS is the only data or measurement system, please identify ODIS as such.
- e. Refer to the response to OCA/USPS-18(e). Please identify any data or measurement systems other than ODIS that permit comparison of First-Class Mail and Priority Mail in terms of the percentage of intra-P&DC and inter-P&DC volume, and the average number of days to delivery for such volume, and provide the required percentages and average number of days from such data or measurement systems. If ODIS is the only data or measurement system, please identify ODIS as such.

**RESPONSE:**

- a.-e. No other such data systems exist.

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**OCA/USPS-107.** Please refer to the response to DFC/USPS-5(b), and OCA/USPS-14(a), which states, in part, “Priority Mail has a service standard that can be overnight, 2nd day, or 3rd day.” Please explain why the Postal Service does not measure the percentage of Priority Mail achieving the 3rd day service standard using PETE.

**RESPONSE:**

The Postal Service does not use PETE to measure the percentage of Priority Mail achieving the 3rd day service standard because the 3-day destination areas do not represent a significant part of the processing and distribution network which serves the majority of our customers.

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**OCA/USPS-108.** Please refer to the response to DFC/USPS-4. Please provide a table showing EXFC on-time service performance by quarter for FY 2002, FY 2003 and FY 2004.

**RESPONSE:**

Please see the response to DFC/USPS-54.

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**OCA/USPS-109.** Please refer to the response to OCA/USPS-27.

a. Refer to the response to OCA/USPS-27(a), where it states, in part, “information on failures can help local staff diagnose and remediate systematic problems.” Please define the term “failures” as used in this context, discuss what is being referred to in the phrase “information on failures,” cite the table(s), and refer to the specific data on “failures” in the table(s) cited, that “help local staff diagnose and remediate systematic problems,” and explain how local staff use the data cited.

b. Refer to the response to OCA/USPS-27(b). Please identify any data or measurement system other than ODIS that provides data on the achieved levels of performance with respect to the 2<sup>nd</sup> Day, 3<sup>rd</sup> Day, 4<sup>th</sup> Day, 5<sup>th</sup> Day, 6<sup>th</sup> Day, 7<sup>th</sup> Day, 8<sup>th</sup> Day, and 9<sup>th</sup> Day separately for the Parcel Post, BPM, Media Mail, and Library service standards referred to in response to interrogatory OCA/USPS-26. If ODIS is the only data or measurement system, please identify ODIS as such.

**RESPONSE:**

a. “Failures” refer to service standard failures. “Information” refers to commercially sensitive, non-public point-to-point ODIS data. A low ODIS time-in-transit score between two points would indicate the need to review operations and transportation related to those locations to find the source of the failures and to implement needed solutions.

b. ODIS is the only such system.

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**OCA/USPS-110.** Please refer to the response to OCA/USPS-32(a) - (b).

a. Refer to the first bullet. Please confirm that the special services for which claims may be made by postal customers are: Registered Mail (with insurance) service, Insurance service, and COD service. If you do not confirm, please explain and identify all special services for which claims may be made by postal customers.

b. Refer to the first bullet. Fiscal Years 2002, 2003 and 2004, with respect to each of the special services identified in subpart a. of this interrogatory, please provide the number of claims and percentage of claims paid with respect to properly completed and supported claims prior to day 10, within 10 to 15 days, and subsequent to 15 days, after receipt of claims from post offices where filed.

c. Refer to the second bullet. For Fiscal Years 2002, 2003 and 2004, please provide nationwide data for First-Class Mail parcels and Package Services parcels showing the percent of time that such parcels are delivered within the number of days specified by the applicable service standard, and the average number of days to delivery.

d. Refer to the third bullet. Fiscal Years 2002, 2003 and 2004, with the exception of the period between November 16 and January 1, please provide the number and percentage of mailing lists corrected within 15 working days with respect to the special services Address Changes for Election Boards, Correction of Mailing Lists, and ZIP Coding of Mailing Lists.

**RESPONSE:**

a. Confirmed

b. The requested data are only available for FY2004. See table below.

**Claims Processing Timelines - FY 2004**

	9 days or less	10 - 14 Days	15 + Days	Total Processed
Numbered Insured _1/	62,000	2,670	10,130	74,800
COD	20,790	520	5,980	27,290
Express Mail	2,240	100	500	2,840
Registered Mail	220	40	290	550
Bulk Insured _2/	170	10	20	200
<b>Total</b>	<b>85,420</b>	<b>3,340</b>	<b>16,920</b>	<b>105,680</b>

**Note:** This represents paid claims that were filed correctly at initial submission.

1/ Numbered Insured represents mailings other than Bulk Insured.

2/ Bulk Insured are mailings by business mailers.

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c. Information concerning time to delivery and other aspects of delivery performance is available from barcoded label scans for First-Class Mail parcels with Delivery Confirmation or Signature Confirmation, when the pieces receive both an acceptance scan and a delivery scan. The information for First-Class Mail derives from incomplete data sets which are still under development. As a result, the data are not necessarily indicative of delivery performance for all First-Class Mail pieces, or even for all First-Class Mail parcels with Delivery Confirmation or Signature Confirmation. In particular, year-to-year comparisons are not considered to be reliable. The Postal Service does not have data on service performance using delivery confirmation data for FY 2002; for FY 2003 only a limited number of records are available and these records are incomplete. The table below presents the data for FY 2004 for First-Class Mail with Delivery Confirmation for on-time service percentage. Average days to delivery for First-Class Mail parcels with Delivery Confirmation is not available.

**First-Class Mail with Delivery Confirmation  
FY 2004**

Service Standard	On-Time Performance
One Day	77.81 %
Two-Day	70.93 %
Three-Day	67.50 %

For data on Package Services, please see the response to DFC/USPS-11.

d. These data are not collected.

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**OCA/USPS-112**

Please refer to the Postal Service's Five-Year Strategic Plan for Fiscal Years 2004-2008, and Exhibit 2-2., "First-Class Mail Service Standard Improvement," at page 27.

- a. Please refer to the row "PQ 2 -00," column "3-Day Service." Please confirm that the entry 683,218 should equal 683,153 (849,043 - 8,744 - 157,081). If you do not confirm, please explain. If you do confirm, please explain the cause of the discrepancy between Exhibit 2-2 and your answer.
- b. Refer to the row "Change +/-," column "Total Pairs." Please show the distribution of the 1,844 3-digit ZIP Code pairs to the 1-day service, 2-day service, and 3-day service columns.
- c. For the period PQ 2 2000 to PQ 2 2003, please provide the number of 3-digit ZIP Code pairs that:
  - i. upgraded from 3-day service (a) to 2-day service and (b) to 1-day service;
  - i. (a) upgraded from 2-day service to 1-day service and (b) downgraded to 3-day service; and
  - ii. downgraded from 1-day service (a) to 2-day service and (b) to 3-day service.
- d. For the period PQ 2 2000 to PQ 2 2003, please provide the percentage of First-Class Mail volume associated with the 3-digit ZIP Code pairs that:
  - i. upgraded from 3-day service (a) to 2-day service and (b) to 1-day service;
  - ii. (a) upgraded from 2-day service to 1-day service and (b) downgraded to 3-day service; and
  - iii. downgraded from 1-day service (a) to 2-day service and (b) to 3-day service.

**RESPONSE:**

- a. Not confirmed. When the data were provided for inclusion in the Strategic Plan, the 3-Day total of 683,281 had the final two digits transposed to incorrectly read "683,218". That typographical error accounts for the discrepancy in Exhibit 2-2 of the Strategic Plan.
- b. N/A
- c.
  - i. upgraded from 3-day to: 2-day: 49,262; upgraded from 2-day to 1-day: 16.
  - ii. upgraded from 2-day to 1-day: 35; downgraded from 2-day to 3-day: 26,889.

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**RESPONSE to OCA/USPS-112 (continued):**

- iii. downgraded from 1-day to 2-day: 33; downgraded from 1-day to 3-day: 3.
  
- d. The Postal Service is determining whether a response can be developed.

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**OCA/USPS-113.** Please refer to the Postal Service's Five Year Strategic Plan for Fiscal Years 2004-2008, at page 87, where it states, in part, "The Express Mail Validation System (EMVS) is an external validation of Express Mail service performance. EMVS provides a side-by-side service standard comparison of Express Mail test pieces with PTS [Product Tracking System]." Please provide the same level of detail with respect to EMVS as is provided for EXFC and PETE for the following: "Indicator," "Scope," "Statistical Reliability," "Limitations," "Source" and "Data Verification and Validity."

**RESPONSE:**

Express Mail Validation System (EMVS)

Indicator: External validation of Express Mail service performance

Scope:

EMVS is designed to provide quarterly data of Express Mail performance. The EMVS study uses actual Express Mail pieces (using standard Postal Service Express Mail envelopes) that are indistinguishable from all other Express Mail volume. Service time is tracked from the time mail is deposited in a collection box or at a Post Office in order to provide a view of service from the customer's perspective.

The system was established in PQ III, FY 2002 to provide a comparison of test mail results against PTS for transit time, customer label service standards and customer receipt of Attempt-to-deliver (ATD) notices.

Statistical Reliability:

EMVS is a quarterly, Area-based, destination-based system, with the sample sizes set to achieve estimates of on-time performance for each area. Nationally, 4,320 pieces of

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test mail will be created each quarter. In order to achieve the +/- 4% precision level desired at the area level, each of the nine areas (including Capital Metro) should receive at least 384 pieces, the minimum number of pieces required to achieve the precision level.

Limitations:

EMVS is an area level study measuring overnight service standards only. Inductions and receipts occur in EXFC or PETE 3-digit ZIP Codes only. EMVS is not tested during a holiday exclusion period. For FY 05 that period covered eleven weeks beginning Saturday, November 20th through Friday, February 4<sup>th</sup>.

Source:

EMVS is designed and operated by a contractor as an independent, objective validation of Express Mail service performance.

Data verification and validity:

All non-matches, ATD gaps, late mailpieces and mailpieces with alternate delivery scans undergo special investigations by the contractor, including follow-up interviews with both droppers and reporters, data reviews cross-checking for patterns that suggest errors, validation of induction times through receipts for postage (when inducted at a window unit) as well as project manager reviews.

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**OCA/USPS-114**

Please refer to the response to USPS-LR-K-117, "First-Class Mail Service Standard Changes."

- a. For PQ 4 of 2002, please confirm that the Postal Service upgraded 40 First-Class Mail 3-digit ZIP Code pairs from 3-day service standard to 2-day service. If you do not confirm, please explain.
- b. For PQ 4 of 2002, please provide the percentage of First-Class Mail volume associated with the 40 3-digit ZIP Code pairs that were upgraded.
- c. During FY 2002, did the Postal Service upgrade or downgrade any other First-Class Mail 3-digit ZIP Code pairs? If so, please provide for each service standard, the number of 3-digit ZIP Code pairs that were upgraded or downgraded, and the percentage of First-Class Mail volume associated with these upgraded and downgraded 3-digit ZIP Code pairs.
- d. For PQ 1 of 2003, please confirm that the Postal Service upgraded 106 First-Class Mail 3-digit ZIP Code pairs from 3-day service standard to 2-day service, and downgraded 90 ZIP Code pairs from 2-day service standard to 3-day service standard. If you do not confirm, please explain.
- e. For PQ 1 of 2003, please provide the percentage of First-Class Mail volume associated with the 106 3-digit ZIP Code pairs that were upgraded, and the 90 3-digit ZIP Code pairs that were downgraded.
- f. During FY 2004, did the Postal Service upgrade or downgrade any First-Class Mail 3-digit ZIP Code pairs? If so, please provide for each service standard, the number of 3-digit ZIP Code pairs that were upgraded or downgraded, and the percentage of First-Class Mail volume associated with these 3-digit ZIP Code pairs.
- g. For PQ 2 of 2005, please confirm that the Postal Service upgraded 20 First-Class Mail 3-digit ZIP Code pairs from 2-day service standard to 1-day service, and downgraded 9 ZIP Code pairs from 1-day service standard to 2-day service standard. If you do not confirm, please explain.
- h. For PQ 2 of 2005, please provide the percentage of First-Class Mail volume associated with the 20 3-digit ZIP Code pairs that were upgraded, and the 9 3-digit ZIP Code pairs that were downgraded.

**RESPONSE:**

- a. Confirmed.
- b. The Postal Service interprets the question as seeking the estimated percentage of total originating and total destinating First-Class Mail volumes represented by the 40 3-digit ZIP Code pairs referenced in subpart (a) during FY 02, Quarter 4.  
  
An effort is underway to compile such data.

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**RESPONSE to OCA/USPS-114 (continued):**

- c. Because of the data archiving problems described in response to DBP/USPS-4, the Postal Service is unable to respond here beyond the scope indicated in response to that interrogatory, meaning that it will only be able to provide the Quarter 4 data in response to subpart (b).
- d. Confirmed.
- e. The Postal Service interprets the question as seeking the estimated percentage of total originating and total destinating First-Class Mail volumes represented by the 106 upgraded and the 90 downgraded 3-digit ZIP Code pairs referenced in subpart (d) during FY 03, Quarter 1. An effort is underway to compile such data.
- f. As indicated in Library Reference K-117, there were 20 First-Class Mail upgrades and 197 downgrades made during FY 04, Quarter 4. The Postal Service interprets the question as seeking the estimated percentage of total originating and total destinating First-Class Mail volumes represented by the 20 upgraded and the 197 downgraded 3-digit ZIP Code pairs referenced in subpart (e) during FY 03, Quarter 1. An effort is underway to compile such data.
- g. Confirmed.
- h. The Postal Service interprets the question as seeking total originating and total destinating First-Class Mail volumes estimated by ODIS to travel between the 20 3-digit ZIP Code upgraded pairs and the 9 downgraded pairs referenced in subpart (g) during FY 05, Quarter 2. An effort is underway to compile such data.

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**OCA/USPS-115.** Please refer to the Postal Service's Five-Year Strategic Plan for Fiscal Years 2004-2008, at page 28, where it states, in part,

For example, many major mailers or mailing services use CONFIRM service to track the performance of some categories of Standard Mail pieces and Delivery Confirmation service to track Parcel Select performance. While these indicators are useful for the Postal Service and for participating customers in identifying potential areas for service improvement, the data is not statistically representative for all mailers and for the mail category.

- a. Please identify the mail "categories of Standard Mail pieces" for which CONFIRM service is used to track service performance.
- b. Please identify the "indicators useful for the Postal Service," and explain how those indicators are useful.
- c. Please confirm that the data generated by CONFIRM service is "statistically representative" for the mail "categories of Standard Mail pieces" identified in subpart a., above? If you do confirm, please provide the statistically representative results for the mail categories of Standard Mail. If you do not confirm, please provide the results currently available to track service performance. Also, please explain and address the following:
  - i. Has the Postal Service undertaken any analysis of the data generated by CONFIRM service to determine the requirements or changes necessary to make the data "statistically representative" for the mail "categories of Standard Mail pieces" identified in subpart a., above? Please provide any such analysis, or any other reports, studies, or other documents addressing the requirements or changes necessary to make the CONFIRM service data "statistically representative."
  - ii. What policy changes or other actions has the Postal Service taken, or have been identified that need to be undertaken, to make the data generated by CONFIRM service "statistically representative" for the mail "categories of Standard Mail pieces" identified in subpart a., above? Please explain.

**RESPONSE:**

- a. CONFIRM is eligible for use with all Standard Mail categories, as long as the mailpieces are automation compatible and letter-size or flat-size.
- b. See USPS-T-1/MC20002-1 at 4. CONFIRM data permit the analysis of intervals between mail processing steps. As such, unusual delays would suggest the potential existence of a problem in mail processing operations that could be investigated. As

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quoted above, evidence of such delays is “useful for the Postal Service and for participating customers in identifying potential areas for service improvement.”

c. Not confirmed. CONFIRM is currently available to subscribers who obtain CONFIRM information as a consequence of their subscription. CONFIRM was not designed or intended to produce “statistically representative” indications of performance. Further, there are no plans to attempt to produce “statistically representative” indications of performance. See also the response to part (b).

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**OCA/USPS-116.** Please refer to the Postal Service's Five-Year Strategic Plan for Fiscal Years 2004-2008, at page 28, where it states, in part,

For example, many major mailers or mailing services use CONFIRM service to track the performance of some categories of Standard Mail pieces and Delivery Confirmation service to track Parcel Select performance. While these indicators are useful for the Postal Service and for participating customers in identifying potential areas for service improvement, the data is not statistically representative for all mailers and for the mail category.

- a. Please confirm that the data generated by Delivery Confirmation and/or Signature Confirmation service is "statistically representative" for Parcel Select? If you do confirm, please provide the statistically representative results for Parcel Select. If you do not confirm, please provide the results currently available to track service performance.
- b. Has the Postal Service undertaken an analysis of the data generated by Delivery Confirmation and/or Signature Confirmation service to determine the requirements or changes necessary to make the data "statistically representative" for Parcel Select? Please provide such an analysis, or any other reports, studies, or other documents addressing the requirements or changes necessary to make the Delivery Confirmation and/or Signature Confirmation service data "statistically representative."
- c. What policy changes or other actions has the Postal Service taken, or have been identified that need to be undertaken, to make the data generated by Delivery Confirmation and/or Signature Confirmation service "statistically representative" for Parcel Select? Please explain.

**RESPONSE:**

- a. Not confirmed. Please see the response to DFC/USPS-11.
- b. No.
- c. None. There are no plans to do so, since the purpose of the data is to provide information to the participating Parcel Select drop shippers and address any issues regarding the service that the Postal Service is providing to them.

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**OCA/USPS-117.** Please refer to the Postal Service's Five-Year Strategic Plan for Fiscal Years 2004-2008, at page 28, where it states, in part, "Currently, 498 publishers have registered 2,169 publications in the ePUBWATCH system, which tracks problems with Periodicals mail."

- a. How many publishers are currently registered in the ePUBWATCH system?
- b. How many publications are currently registered in the ePUBWATCH system?
- c. Please confirm that the data generated by ePUBWATCH system is "statistically representative" for Periodicals Mail. If you do confirm, please provide the statistically representative results for Periodicals Mail. If you do not confirm, please provide the results currently available to track service performance. Also, please explain and address the following:
  - i. Has the Postal Service undertaken any analysis of the data generated by the ePUBWATCH system to determine the requirements or changes necessary to make the data "statistically representative" for Periodicals Mail? Please provide any such analysis, or any other reports, studies, or other documents addressing the requirements or changes necessary to make the ePUBWATCH system data "statistically representative."
  - ii. What policy changes or other actions has the Postal Service taken, or have been identified that need to be undertaken, to make the data generated by ePUBWATCH system "statistically representative" for Periodicals Mail? Please explain.

**RESPONSE:**

- a. 1,132
- b. 4,540
- c. The ePUBWATCH system is not statistically representative. It was not designed to be statistically representative, and does not function as a service performance measure. It is a customer service tool developed to replace and enhance the old paper-based publication watch system. The only publications tracked are from registered ePUBWATCH users. ePUBWATCH does not track every publication of a

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registered publisher, or even every issue or mailing of a tracked publication, and does not provide service performance information.

- i. No. Please see response to part c.
- ii. Not applicable. Please see response to part c.