

Before The
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

Postal Rate and Fee Changes, 2006)

Docket No. R2006-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
(OCA/USPS -27-65)
(July 11, 2006)

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. Instructions included with OCA interrogatories OCA/USPS-T32-1-7, dated June 2, 2006, are hereby incorporated by reference.

Respectfully submitted,

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OCA/USPS-27. Please refer to USPS-T-38 at 6, n. 2. Witness Yeh states that: “the Postal Service intends to amend its regulations to require that Bound Printed Matter be paid either by customer generated postage meter or by permit imprint.”

- a. Does this mean that the Postal Service will deny consumers and small businesses the right to use adhesive stamps to pay for Bound Printed Matter (BPM) mail? Explain in full.
- b. Please confirm that §541 of the Domestic Mail Classification Schedule (DMCS) provides that: “Postage must be paid as set forth in section 3000.” If this is not confirmed, then explain in full.
- c. Please confirm that §3040 of the DMCS provides that: “All mail may be prepaid with postage meter indicia, adhesive stamps, permit imprint, or other payment methods specified by the Postal Service.” If this is not confirmed, then explain in full.
- d. Please confirm that denying stamp-using mailers of BPM the opportunity to pay postage by means of stamps is a violation of §3040. If this is not confirmed, then explain in full.
- e. Please refer to witness Yeh’s response to interrogatory DBP/USPS-T38-9 that “ancillary services such as, but not limited to, Certificate of Mailing, Delivery Confirmation, Signature Confirmation, Insurance, and COD” will be denied to retail customers of BPM. Confirm that such a denial violates §560 of the DMCS which explicitly allows BPM mailers the right to add these ancillary services to a BPM mailing. If this is not confirmed, then explain in full.

- f. Please confirm that a change to the DMCS can only be made pursuant to 39 U.S.C. §3623. If this is not confirmed, then explain in full.
- g. Please cite to any portion of the request in Docket No. R2006-1 or to documents in any other postal proceeding that presents the Postal Service's formal request under §3623 to modify the absolute privilege set forth in §3040 that all mail can be prepaid with adhesive stamps.
- h. Please cite to any portion of the request in Docket No. R2006-1 or to documents in any other postal proceeding that presents the Postal Service's formal request under §3623 to modify §§541 and 560 of the DMCS.

OCA/USPS-28. Please provide ODIS quarterly reports for FY 2006.

OCA/USPS-29. Please provide volume estimates of single-piece First-Class Mail broken down into the three service standards for First-Class Mail, i.e., volume of mail with an Overnight service standard; volume of mail with a 2-day standard; and volume of mail with a 3-day standard. The three volume figures should sum to the total volume of single-piece First-Class Mail. If precise figures are unavailable, then ball park estimates are acceptable. Please cite the sources used to answer this interrogatory.

OCA/USPS-30. For FY 2005, please provide an aggregate Table 4 from ODIS that shows the 4 quarters (i.e., Q1, Q2, Q3, and Q4) combined into annual figures.

- a. Also provide the volumes (for each cell) underlying the percentage figures.
- b. For each row of Table 4, provide the total volume figure that is used to compute the percentage set forth in each cell.

OCA/USPS-31. For FY 2006 please provide an aggregate Table 4 from ODIS that shows all quarters available (i.e., Q1, Q2, and Q3) combined into total year-to-date figures.

- a. Also provide the volumes (for each cell) underlying the percentage figures.
- b. For each row of Table 4, provide the total volume figure that is used to compute the percentage set forth in each cell.

OCA/USPS-32. For FY 2005:

- a. What is the percent of First-Class Mail volume that is single-piece?
- b. What is the volume of First-Class Mail that is single-piece?
- c. What is the percent of First-Class Mail volume that is paid by stamps?
- d. What is the volume of First-Class Mail that is paid by stamps?
- e. What is the percent of First-Class Mail volume that is paid by meters?
- f. What is the volume of First-Class Mail that is paid by meters?
- g. What is the percent of First-Class Mail volume that is paid by permit?
- h. What is the volume of First-Class Mail that is paid by permit?
- i. For parts a. – h. above, cite the source for the figures provided.

OCA/USPS-33. For FY 2006, year-to-date:

- a. What is the percent of First-Class Mail volume that is single-piece?
- b. What is the volume of First-Class Mail that is single-piece?
- c. What is the percent of First-Class Mail volume that is paid by stamps?
- d. What is the volume of First-Class Mail that is paid by stamps?
- e. What is the percent of First-Class Mail volume that is paid by meters?

- f. What is the volume of First-Class Mail that is paid by meters?
- g. What is the percent of First-Class Mail volume that is paid by permit?
- h. What is the volume of First-Class Mail that is paid by permit?
- i. For parts a. – h. above, cite the source for the figures provided.

OCA/USPS-34. For FY 2005, please provide an aggregate Table 6 from ODIS that shows the 4 quarters (i.e., Q1, Q2, Q3, and Q4) combined into annual figures.

- a. Also provide the volumes (for each cell) underlying the percentage figures.
- b. For each row of Table 6, provide the total volume figure that is used to compute the percentage set forth in each cell.

OCA/USPS-35. For FY 2006 please provide an aggregate Table 6 from ODIS that shows all quarters available (i.e., Q1, Q2, and Q3) combined into total year-to-date figures.

- a. Also provide the volumes (for each cell) underlying the percentage figures.
- b. For each row of Table 6, provide the total volume figure that is used to compute the percentage set forth in each cell.

OCA/USPS-36. For FY 2005, please provide an aggregate Table 7 from ODIS that shows the 4 quarters (i.e., Q1, Q2, Q3, and Q4) combined into annual figures.

- a. Also provide the volumes (for each cell) underlying the percentage figures.
- b. For each row of Table 7, provide the total volume figure that is used to compute the percentage set forth in each cell.

OCA/USPS-37. For FY 2006 please provide an aggregate Table 7 from ODIS that shows all quarters available (i.e., Q1, Q2, and Q3) combined into total year-to-date figures.

- a. Also provide the volumes (for each cell) underlying the percentage figures.
- b. For each row of Table 7, provide the total volume figure that is used to compute the percentage set forth in each cell.

OCA/USPS-38. For FY 2005, please provide an aggregate Table 8 from ODIS that shows the 4 quarters (i.e., Q1, Q2, Q3, and Q4) combined into annual figures.

- a. Also provide the volumes (for each cell) underlying the percentage figures.
- b. For each row of Table 8, provide the total volume figure that is used to compute the percentage set forth in each cell.

OCA/USPS-39. For FY 2006 please provide an aggregate Table 8 from ODIS that shows all quarters available (i.e., Q1, Q2, and Q3) combined into total year-to-date figures.

- a. Also provide the volumes (for each cell) underlying the percentage figures.
- b. For each row of Table 8, provide the total volume figure that is used to compute the percentage set forth in each cell.

OCA/USPS-40. For FY 2005, please provide an aggregate Table 9 from ODIS that shows the 4 quarters (i.e., Q1, Q2, Q3, and Q4) combined into annual figures.

- a. Also provide the volumes (for each cell) underlying the percentage figures.
- b. For each row of Table 9, provide the total volume figure that is used to compute the percentage set forth in each cell.

OCA/USPS-41. For FY 2006 please provide an aggregate Table 9 from ODIS that shows all quarters available (i.e., Q1, Q2, and Q3) combined into total year-to-date figures.

- a. Also provide the volumes (for each cell) underlying the percentage figures.
- b. For each row of Table 9, provide the total volume figure that is used to compute the percentage set forth in each cell.

OCA/USPS-42. With respect to ODIS sampling, what percentage of total Priority Mail volume is of a type that is eligible to be sampled by ODIS? Also, please describe the types of Priority Mail that may be sampled by ODIS, as contrasted with types of Priority Mail that would not be included in the ODIS sample.

OCA/USPS-43. What percentage of Priority Mail has Product Tracking System ancillary services added to it? List all of the types of Product Tracking System ancillary services that may be added to Priority Mail.

- a. With respect to the service performance scores presented at <http://www.usps.com/serviceperformance/welcome.htm> for Priority Mail, what ancillary service types are included for the purpose of calculating the performance scores?
- b. What is the number of Priority Mail pieces that was used to develop the Overnight performance score of 87% on time? What total piece figure was used to calculate this score?

- c. What is the number of Priority Mail pieces that was used to develop the 2-day performance score of 87% on time? What total piece figure was used to calculate this score?
- d. What is the number of 3-day Priority Mail pieces (3%) for which service performance could not be reported?

OCA/USPS-44. For FY 2005, please provide volume estimates of Priority Mail broken down into the three service standards for Priority Mail, i.e., volume of mail with an Overnight service standard; volume of mail with a 2-day standard; and volume of mail with a 3-day standard. The three volume figures should sum to the total volume of Priority Mail. If precise figures are unavailable, then ball park estimates are acceptable. Please cite the sources used to answer this interrogatory.

OCA/USPS-45. For FY 2006, year-to-date, please provide volume estimates of Priority Mail broken down into the three service standards for Priority Mail, i.e., volume of mail with an Overnight service standard; volume of mail with a 2-day standard; and volume of mail with a 3-day standard. Give the dates for the period of time used to answer the question. The three volume figures should sum to the total volume of Priority Mail for the specified period. If precise figures are unavailable, then ball park estimates are acceptable. Please cite the sources used to answer this interrogatory.

OCA/USPS-46. For FY 2005, please provide volume estimates of Express Mail broken down into the following categories: (1) Overnight, (2) Second Day with a 2-day commitment, (3) Second Day with a 3-day commitment, (4) Second Day with a 4-day commitment, and (5) Second Day with a 5-day commitment. The 5 volume figures

should sum to the total volume of Express Mail. If precise figures are unavailable, then ball park estimates are acceptable. Please cite the sources used to answer this interrogatory.

OCA/USPS-47. For FY 2006, year-to-date, please provide volume estimates of Express Mail broken down into the following categories: (1) Overnight, (2) Second Day with a 2-day commitment, (3) Second Day with a 3-day commitment, (4) Second Day with a 4-day commitment, and (5) Second Day with a 5-day commitment. The 5 volume figures should sum to the total volume of Express Mail for the specified period. If precise figures are unavailable, then ball park estimates are acceptable. Please cite the sources used to answer this interrogatory.

OCA/USPS-48. With respect to the performance scores presented at <http://www.usps.com/serviceperformance/welcome.htm> for Express Mail, provide the volume figures used to calculate the Overnight on-time score of 95%. Also provide the volume figures used to calculate the combined Overnight and 2-day score of 96% on time.

OCA/USPS-49. Please provide annual on-time scores for Express Mail for FY2005, separately, for the following categories:

- a. Overnight
- b. 2-day commitment

Cite the source(s) for the figures provided. Also, give the volume figures used to calculate each score.

OCA/USPS-50. Please provide year-to-date on-time scores for Express Mail for FY2006, separately, for the following categories:

- a. Overnight
- b. 2-day commitment

Cite the source(s) for the figures provided. Please state the time period involved. Also, give the volume figures used to calculate each score.

OCA/USPS-51. At <http://www.usps.com/serviceperformance/welcome.htm>, it is stated that, "Parcels entered at retail represent 8% of the total surface package volume." What proportion of the 8% (i.e., retail volume) carries a Product Tracking System ancillary service that permits the service score to be computed?

- a. Please give all volume figures used to calculate the percentage figures.
- b. Please list all ancillary services that may be added to package services that can be used to compute on time scores.
- c. At <http://www.usps.com/serviceperformance/retailpackage.htm>, please provide the volume figures that underlie each performance score (i.e., for 2-day, 3-day, 4-day, 5-day, 6-day, 7-day, 8-day, and 9-day) package services mail.

OCA/USPS-52. For FY 2005, please provide:

- a. Total package services volumes
- b. Retail package services volumes
- c. Non-retail package services volumes
- d. Parcel select volumes

Please cite the source(s) used to answer this interrogatory.

OCA/USPS-53. For FY 2006, year-to-date, please provide:

- a. Total package services volumes
- b. Retail package services volumes
- c. Non-retail package services volumes
- d. Parcel select volumes

Please cite the source(s) used to answer this interrogatory. Please specify the time period used to answer the interrogatory.

OCA/USPS-54. Please provide annual on-time scores for Package Services mail for FY2005, separately, for the following categories:

- a. 2-day
- b. 3-day
- c. 4-day
- d. 5-day
- e. 6-day
- f. 7-day
- g. 8-day
- h. 9-day

Cite the source(s) for the figures provided. Also, give the volume figures used to calculate each score.

OCA/USPS-55. Please provide year-to-date on-time scores for Package Services mail for FY2006, separately, for the following categories:

- a. 2-day

- b. 3-day
- c. 4-day
- d. 5-day
- e. 6-day
- f. 7-day
- g. 8-day
- h. 9-day

Cite the source(s) for the figures provided. Please state the time period involved. Also, give the volume figures used to calculate each score.

OCA/USPS-56. Please refer to Tr. 8D/4715-19 (Interrogatory OCA/USPS-43), Docket No. R2005-1. Please file a complete update for all questions posed (and answered, including the “expanded response”) beginning with the period immediately following the period covered by the R2005-1 answer through and including today’s date. Please state the dates covered by the answer provided to the instant (Docket No. R2006-1) interrogatory.

OCA/USPS-57. Please refer to Tr. 8D/4720-24 (Interrogatory OCA/USPS-46), Docket No. R2005-1. Please file a complete update for all questions posed (and answered) beginning with the period immediately following the period covered by the R2005-1 answer through and including today’s date. Please state the dates covered by the answer provided to the instant (Docket No. R2006-1) interrogatory.

OCA/USPS-58. Please refer to Tr. 8D/4730-42 (Interrogatory OCA/USPS-53), Docket No. R2005-1. Please file a complete update for all questions posed (and answered)

beginning with the period immediately following the period covered by the R2005-1 answer through and including today's date. Please state the dates covered by the answer provided to the instant (Docket No. R2006-1) interrogatory.

OCA/USPS-59. What was the total volume of mail collected from mail collection boxes in FY 2005?

- a. Please break down this total into separate volume figures for the classes and subclasses of mail collected.
- b. If a precise answer cannot be provided, then a ballpark estimate will suffice. Please state the source(s) for the answer provided.

OCA/USPS-60. What is the total volume of mail collected from mail collection boxes in FY 2006, year-to-date?

- a. Please break down this total into separate volume figures for the classes and subclasses of mail collected.
- b. If a precise answer cannot be provided, then a ballpark estimate will suffice. Please state the source(s) for the answer provided. Also state the time period used in the answer.

OCA/USPS-61. Please refer to Tr. 10C/3455 (Interrogatory OCA/USPS-225), Docket No. R2001-1. Please provide equivalent figures for the years FY2002, FY 2003, FY2004, FY2005, and FY2006 (year-to-date).

OCA/USPS-62. This interrogatory seeks information on the service standards and achieved service performance for Express Mail. Please refer to your response to OCA/USPS-2(a) and (d).

- a. Refer to your response to part a. Please confirm that the Postal Service collects Product Tracking System (herein "PTS") data on achieved service performance separately for Custom Designed (Rate Schedule (herein "RS") 122), Next Day and 2d Day PO to PO (RS 123), and, Next Day and 2d Day PO to Addressee (RS 123). If you do not confirm, please explain. If you do confirm, please provide the achieved service performance data requested in OCA/USPS-2(a).
- b. Refer to your response to part a. Please confirm that the Postal Service collects PTS data on achieved service performance for one or more rate categories, or one or more subsets of mail or type of Express Mail service. If you do not confirm, please explain. If you do confirm, please provide the achieved service performance data requested in OCA/USPS-2(a), and define any subset of mail or type of mail service.
- c. Refer to your response to part a., which requests "data from all measuring systems showing the achieved service performance." Please confirm that the Postal Service measures achieved service performance for Express Mail using measuring systems other than PTS. If you do not confirm, please explain. If you do confirm, please provide the achieved service performance data requested in OCA/USPS-2(a) for those measuring systems, and define any subset of mail or type of Express Mail service measured, where applicable.

- d. Refer to your response to part d. Please confirm that the PTS data is a statistically representative measure of the service standard cited (i.e., DMM section 113) for Custom Designed (RS 122), Next Day and 2d Day PO to PO (RS 123), and, Next Day and 2d Day PO to Addressee (RS 123); and, any subset of mail or type of Express Mail services. If you do not confirm, please 1) explain and rank order the most important reasons why the data is not statistically representative; 2) describe any existing plans by the Postal Service, and their likely implementation in the next 1, 3 or 5 years, to develop statistically representative data on achieved service performance; and, 3) indicate “No Plans” if there are no existing plans to develop statistically representative data on achieved service performance.

OCA/USPS-63. This interrogatory seeks information on the service standards and achieved service performance for First-Class Mail. Please refer to your response to OCA/USPS-3(a), (b), and (d).

- a. Refer to your response to part a. Please confirm that the External First-Class (herein “EXFC”) system does not provide achieved service performance data for First-Class Mail as a whole, or the following First-Class Mail subclasses, as a whole: Letters and Sealed Parcels (Rate Schedule (herein “RS”) 221), or Cards (RS 222). If you do not confirm, please explain.
- b. Refer to your response to part a., which requests “data from all measuring systems showing the achieved service performance.” Please confirm that the Postal Service measures achieved service performance using measuring systems other than the EXFC system for First-Class Mail as a whole, and the

following First-Class Mail subclasses, as a whole: Letters and Sealed Parcels (RS 221), and Cards (RS 222). If you do not confirm, please explain. If you do confirm, please provide the achieved service performance data requested in OCA/USPS-3(a) for those measuring systems.

- c. Refer to your response to part a., which requests “data from all measuring systems showing the achieved service performance.” Please confirm that the Postal Service measures achieved service performance using measuring systems other than EXFC system for one or more rate categories, or one or more subsets of mail or type of First-Class Mail service. If you do not confirm, please explain. If you do confirm, please provide the achieved service performance data requested in OCA/USPS-3(a) for those measuring systems, and define any rate category, subset of mail or type of First-Class Mail service measured, where applicable.
- d. Refer to your response to part b. Please confirm that the EXFC system measures achieved service performance for a subset of mail or type of First-Class Mail service, namely, seeded letter-shaped mailpieces entered at collection boxes as single-piece First-Class Mail in the Letters and Sealed Parcels subclass. If you do not confirm, please explain.
- e. Refer to your response to part b. Please confirm that the EXFC system does not measure achieved service performance for the following rate categories or subsets of mail or type of First-Class Mail service: 1) flat-shaped or parcel-shaped mailpieces entered as single-piece First-Class Mail in the Letters and Sealed Parcels subclass; and, 2) letter-shaped, flat-shaped, or parcel-shaped

mailpieces entered as presort or automation presort First-Class Mail in the Letters and Sealed Parcels subclass. If you do not confirm, please explain.

- f. Refer to your response to part d. Please confirm that the EXFC system data is a statistically representative measure of the service standard cited (i.e., DMM section 133.2.1) for the subset of First-Class Mail measured. If you do not confirm, please 1) explain and rank order the most important reasons why the data is not statistically representative; 2) describe any existing plans by the Postal Service, and their likely implementation in the next 1, 3 or 5 years, to develop statistically representative data on achieved service performance; and, 3) indicate “No Plans” if there are no existing plans to develop statistically representative data on achieved service performance.
- g. Refer to your response to part d. Please confirm that the PTS data is a statistically representative measure of the service standard cited (i.e., DMM section 123.2.2) for Priority Mail. If you do not confirm, please 1) explain and rank order the most important reasons why the data is not statistically representative; 2) describe any existing plans by the Postal Service, and their likely implementation in the next 1, 3 or 5 years, to develop statistically representative data on achieved service performance; and, 3) indicate “No Plans” if there are no existing plans to develop statistically representative data on achieved service performance.

OCA/USPS-64. This interrogatory seeks information on the service standards and achieved service performance for Package Services. Please refer to your response to OCA/USPS-6(a), (b), and (d).

- a. Refer to your response to part a. Please confirm that the Product Tracking System (herein "PTS") does not provide achieved service performance data for Package Services as a whole, or the following Package Services subclasses, as a whole: Parcel Post (Rate Schedule (herein "RS") 521), Bound Printed Matter (RS 522), Media Mail (RS 523), and Library Mail (RS 524). If you do not confirm, please explain.
- b. Refer to your response to part a., which requests "data from all measuring systems showing the achieved service performance." Please confirm that the Postal Service measures achieved service performance using measuring systems other than PTS for Package Services as a whole, and the following Package Services subclasses, as a whole: Parcel Post (RS 521), Bound Printed Matter (RS 522), Media Mail (RS 523), and Library Mail (RS 524). If you do not confirm, please explain. If you do confirm, please provide the achieved service performance data requested in OCA/USPS-6(a) for those measuring systems.
- c. Refer to your response to part a., which requests "data from all measuring systems showing the achieved service performance." Please confirm that the Postal Service measures achieved service performance using measuring systems other than PTS for one or more rate categories, or one or more subsets of mail or type of Package Services. If you do not confirm, please explain. If you do confirm, please provide the achieved service performance data requested in OCA/USPS-6(a) for those measuring systems, and define any rate category, subset of mail or type of Package Services measured, where applicable.

- d. Refer to your response to part b. Please confirm that the PTS measures achieved service performance for a subset of mail or type of Package Services, namely, Parcel Post, Bound Printed Matter, Media Mail and Library Mail sold at retail windows with Delivery Confirmation. If you do not confirm, please explain.
- e. Refer to your response to part b. Please confirm that the PTS does not measure achieved service performance for the following rate categories or subsets of mail or type of Package Services: 1) Parcel Post Intra-BMC Rates (RS 521.2B); 2) Parcel Post Parcel Select Destination Bulk Mail Center Rates (RS 521.2C); 3) Parcel Post Parcel Select Destination Sectional Center Facility Rates (RS 521.2D); 4) Parcel Post Parcel Select Destination Delivery Unit Rates (RS 521.2E); 5) Parcel Post Parcel Select Return Services Return Delivery Unit Rate Category (RS 521.2F); 6) Parcel Post Parcel Select Return Services Return BMC Rate Category Machinable Pieces and Nonmachinable Pieces (RS 521.2G); 7) Bound Printed Matter Presorted and Carrier Route Rates Flats, Parcels, and Irregular Parcels (RS 522B); 8) Bound Printed matter Presorted Rates, Destination Entry Flats, Parcels, and Irregular Parcels (RS 522C); 9) Bound Printed Matter Carrier Route Rates, Destination Entry Flats, Parcels, and Irregular Parcels (RS 522D); 10) Bound Printed Matter BPM Return Service Return BMC Rate Category (RS 522E); 11) Media Mail mailpieces that are presort entered; or, 12) Library Rate mailpieces that are presort entered. If you do not confirm, please explain.
- f. Refer to your response to part d. Please confirm that the PTS data is a statistically representative measure of the service standard cited (i.e., Attachment

G of the Request, Compliance Statement, response to Rule 54(n)) for Parcel Post, Bound Printed Matter, Media Mail and Library Mail sold at retail with Delivery Confirmation. If you do not confirm, please 1) explain and rank order the most important reasons why the data is not statistically representative; 2) describe any existing plans by the Postal Service, and their likely implementation in the next 1, 3 or 5 years, to develop statistically representative data on achieved service performance; and, 3) indicate “No Plans” if there are no existing plans to develop statistically representative data on achieved service performance.

OCA/USPS-65. This interrogatory seeks information on the service standards and achieved service performance for Special Services. Please refer to your response to OCA/USPS-7(a), (c), and (d).

- a. Refer to your response to part a. Please confirm that in Docket No. 2005-1, the Postal Service provided the same “indicator [that] measures the percent of combined totals of Priority Mail Delivery Confirmation and Signature Confirmation destinating pieces scanned to the number of pieces accepted at retail or in an electronic file provided by the mailer.” If you do not confirm, please provide the same indicator for Fiscal Years 2003 and 2004. If you do confirm, please provide a citation to the record in Docket No. 2005-1.
- b. Refer to your response to part c. With respect to the bullet 2, please provide a citation to the relevant source for the stated “goal” or service standard, and characterize the authority of the source (i.e., regulation, Board-approved policy, press release, executive letter directive, etc.).

- c. Refer to your response to part c. Please confirm that the Postal Service does not measure achieved service performance for the service standards cited in part c., bullet 1 (i.e., Publication 122, concerning the payment of claims within 10 to 15 days) and part c., bullet 3 (i.e., DMM section 507.6.3.6, concerning Address Changes for Election Boards, Correction of Mailing List, and ZIP Coding of Mailing Lists). If you do not confirm, please explain and provide the achieved service performance.
- d. Refer to your response to parts c. and d. Please confirm that the PTS data is a statistically representative measure of the “goal” or service standard cited in part c., bullet 2 (i.e., a Delivery Confirmation and Signature Confirmation combined scan rate of 99.1 percent). If you do not confirm, please 1) explain and rank order the most important reasons why the data is not statistically representative; 2) describe any existing plans by the Postal Service, and their likely implementation in the next 1, 3 or 5 years, to develop statistically representative data on achieved service performance; and, 3) indicate “No Plans” if there are no existing plans to develop statistically representative data on achieved service performance.