

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

SERVICE PERFORMANCE MEASUREMENT	:	DOCKET NO. PI2008-1
SYSTEMS FOR MARKET DOMINANT PRODUCTS	:	

COMMENTS OF TIME WARNER INC.
IN RESPONSE TO COMMISSION ORDER NO. 48
(January 18, 2008)

Time Warner Inc. (Time Warner) respectfully submits the following comments in response to the Commission's Order No. 48, Notice of Request for Comments on Service Performance Measurement Systems for Market Dominant Products (issued December 4, 2007).

Time Warner strongly supports the Postal Accountability and Enhancement Act's requirement for the development of service standards and measurement of service for all classes of mail. The creation of such a system should lead to more reliable and predictable delivery of mail to our ultimate customer, the American public. As a user of all mail classes, Time Warner is pleased to have the opportunity to submit the following comments.

In EXCF, the Postal Service has developed a reliable, widely recognized measurement system, and Time Warner supports the continued use of EXFC for single piece letters and flats. However, in view of the EXFC security breach of several years ago, which many in the industry still remember, Time Warner believes that the service performance measurement proposal should address the

issue of EXFC security and, more broadly, data security for the entire measurement system.

The Postal Service proposes to measure service by the elapsed time between the documented arrival of presorted letters, flats, and parcels at their entry point and at their delivery point, as recorded by external scan, and also to divide this measurement into two components: the time taken by mail processing; . and the time between the last processing scan and in-home arrival. Time Warner supports this approach, which will give both the Postal Service and mailers a valuable diagnostic tool for identifying and addressing problem areas.

With regard to the mail processing component, the Postal Service proposes that the “start the clock” time be established when containers are scanned as they are being removed from the mailer’s truck. Time Warner recommends that the start-the-clock time begin when the mailer’s truck arrives at the Postal Service facility. Some trucking companies report that several hours can pass between their arrival at the facility’s guard station and the actual unloading of the trailer. If the mail is recorded as received when it arrives at the guard station and individual containers are subsequently scanned as they are unloaded from the truck, the Postal Service will be able to determine how long it took to unload the mail. However, for the purpose of service measurement, the clock should be started when the truck arrives at the postal facility.

Time Warner also believes strongly that a one-size-fits-all approach to critical entry times (CETs) across facilities is unacceptable. Mail processing

facilities vary in equipment, volume levels, and geographic coverage. In addition, the Postal Service processes different classes of mail within their own very specific processing windows. The local facility CETs should be established locally and should contain specific CETs for each class. The critical entry times for each mail class at each facility must be published and made available to mailers.

Another example of one size not fitting all pertains to the relationship between containerization and CET. Some mail (e.g., flats on 5-digit pallets) may be able to bypass some initial processing steps and have a later CET than mail in a less finely sorted container. Therefore, a system of service standards that truly reflects operating realities should take into account the level of containerization when establishing the CET.

Time Warner also believes that separate standards should be developed for each class of mail by shape. Mail shape has a definite impact upon mail processing and delivery. For example, Standard letters and Standard flats are processed on different types of equipment with a wide range of processing speeds, machinable letters are DPS sorted and presented to letter carriers in trays, and flats (currently) require manual casing by the carrier. Given these differences, it doesn't make sense to have a single on-time percentage goal for both letters and flats. Individual measurement systems should be established for each mail shape.

The stop-the-clock reporting is also critical. The Postal Service should distribute reporters throughout the country in approximate proportion to volume

density and should make it clear to their contractors how to manage the data collection. For example, standard requirements for contractors should be developed on such matters as what happens when a reporter goes on vacation, relocates, resigns, or fails to report in an accurate or timely manner, and on how reporters will be tested for accuracy. The answers to these questions will determine the quality and reliability of the measurement data.

The Postal Service proposal does not specifically address how the incoming data from the reporters will be handled. Obviously, the only data that can be used for stop-the-clock scans is data that relates to items that also have a verified start-the-clock scan. But once it is determined that the independent contractor has both pieces of data, it must also be determined whether to use 100% of this data, or only a subset, for measurement. And if the latter is the case, the criteria for selecting the subset must be determined as well.

The implementation timeline outlined by the Postal Service appears reasonable. Time Warner supports the Postal Service's approach of not investing too much in the development of interim measurement systems prior to the rollout of a more lasting solution.

Finally, the Postal Accountability and Enhancement Act encourages transparency. Time Warner expects that any data captured in the measurement system will be made available to mailers on a timely basis.

Overall, the Postal Service has made a good start toward developing a reliable measurement system. Time Warner looks forward to continued

improvement of this measurement system through the expansion of the IMB program and further refinements of the stop-the-clock data.

Respectfully submitted

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