BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

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

INITIAL COMMENTS OF DAVID B. POPKIN

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PRCPI20081COMMENTS

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The following are my comments on the United States Postal Service's SERVICE PERFORMANCE MEASUREMENT dated November 2007 and filed December 4, 2007.

The definition of "service performance" as provided on page 4 of the filing should be changed. The current definition will allow the Postal Service to utilize a delivery time that in all likelihood would not have been possible if it weren't for the non-delivery days appearing in the picture.

For example, if a First-Class Mail letter is mailed on a Saturday from New Jersey to Washington DC and is delivered in Washington in a manner that meets the "normal" service standards of two days, it will be delivered on the following Monday. However, since the letter could not have been delivered in one calendar day [since Sunday is a non-delivery day] and since the letter was delivered on the first calendar day after a non-delivery day, it will be counted as having been delivered in one day.

Most two-day mail will never be delivered on the next day after mailing since it is normally staged to be processed at the destinating plant during the day of the day after

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mailing for delivery on the second calendar day. By allowing the Postal Service to claim most of the second-day Service Standard mail deposited on the day before a non-delivery day as having been delivered in one calendar day will distort the delivery time for second-day mail.

This will even cause a greater distortion on three-day service standard mail which is deposited on a Saturday before a Monday holiday. In this case most of the mail will be delivered on Tuesday - three calendar days after mailing. However, since Sunday and Monday were non-delivery days, the mail will be tallied as having been delivered in one day even though normally there is no chance that mail destined to a 3-day area will ever be delivered on the following calendar day.

The solution to this is to establish a procedure that I believe was in use in the past. If a letter is delivered on the first delivery date following one or more non-delivery days, then it will be tallied as if it was delivered on the scheduled service standard day so long as that was a non-delivery day. For example, two-day service standard mail deposited on Friday and delivered on the following Monday would count as having been delivered in two days.[1] In a similar manner, cross country mail with a 3-day service standard and mailed on a Friday before a Monday holiday and delivered on Tuesday would be tallied as three days.[2]

Paragraph 3.2.2   The "start-the-clock" is scheduled to be the following day if the mail is deposited after the last collection time shown on the collection box or lobby drop. If the mail was deposited shortly after the last collection time, it could very well be collected and processed that same day.[3] However, there are many instances where the final collection time as shown on the collection box will be in the morning and the box will be collected in late afternoon. In this case a letter deposited well after the last

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[1]   If it was delivered on Saturday, it would be tallied as one day and if it was delivered on Tuesday, it would be tallied as four days. The non-delivery day would not enter into the picture.
[2]   If it was delivered on Saturday it would be tallied as one day and if it was delivered on Wednesday, it would be tallied as five days. The non-delivery days would not enter into the picture.
[3]   Normally a collector should collect the mail during a 20-minute time frame starting at the time shown on the collection box.

collection time on a Monday but before the actual collection time would have a Tuesday "start-the-clock" and therefore end up being counted as having been delivered in one day less than actuality.

Evaluation of the blue collection boxes located in Chicago, Illinois, shows that there are 2818 collections at 10 AM on weekdays and 3210 collections at 10 AM on Saturdays. While there certainly are many collectors performing this 10 AM collection, it should be equally obvious that they are not all completed by 10:20 AM.

The solution to this is not to allow mailing of test mail after the last collection time shown on the collection box or lobby drop until perhaps 7 or 8 PM[4] to ensure that it will not be dispatched on the day prior to the expected "start-of-clock".

Another problem with the "start the clock" for EXFC results for single-piece First-Class Mail is the time shown for the final collection time on a blue collection box. A high percentage of the single-piece First-Class Mail items enter the system via the blue collection boxes. The service standards are affected by the level of service that is provided in the collection of mail from these blue collection boxes. The required level of service at these blue collection boxes is provided in Sections 311 through 326 of the Postal Operations Manual [POM].

Over the past number of years, there has been a considerable reduction in both the number of blue boxes available and in the collection times at the remaining boxes.

For example, a collection box at a city delivery office must have a weekday collection time of 5 PM or later if:
[a] It generates a weekday daily average of 100 or more pieces [POM 322.1].
[b] Is located in front of a main office, classified station or branch, or an SSPC [POM 322.22b].

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4   Perhaps an even later time would be required at a P&DC location.

[c] Is needed so that a customer will not have to travel more than 2 miles to a box [POM 322.22a].

In spite of these requirements, the Postal Service has reduced the number of 5 PM collection boxes. For example, throughout the entire Borough of The Bronx in New York City, there is only one collection box location that has a 5 PM weekday collection time.[5]

Residential collection boxes require the latest possible collection time [POM 323.41]. For example, evaluation of the collection boxes that are not in front of the local post office in the Rockland County NY area [ZIP Code area 109] shows that 14 of the 16 boxes in Nyack 10960; all 7 boxes in Stony Point 10980; and all 3 boxes in Tappan 10983 have weekday and Saturday collection times of only 9 AM. By making the collection times this early, it either forces the customer to drive to the post office to utilize the 5 PM collection or to delay their mail by a day or more.[6]

My perception of this cut back in collection boxes and in the collection time is a result primarily of the EXFC system. For example, EXFC will measure the overnight mail from Tappan NY to Stony Point NY and it is a lot easier to process this mail and achieve overnight delivery if the mail is inducted into the system at 9 AM than if it is inducted at 5 PM. EXFC works with calendar days so Tuesday is Tuesday regardless of when the mail must be inducted.

The EXFC program has done a number of positive things to improve the mail delivery. The main effect has been to ensure that all collection boxes are collected at or after the posted time, that all of the mail is properly processed, that missent mail is redirected on the same day, etc.

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[5]   5 PM weekday collection at 3300 Connor Street, Bronx NY 10475 - location of the Co-Op City classified station.

[6]   The added delay of 2 or more days could occur with the effect of non-delivery days.

Unfortunately, one of the effects of EXFC has been the removal of collection boxes and the making of final collection times much earlier than they should be.

I wonder why the Postal Service has such an obsession with making the collection times earlier and earlier. The following testimony of USPS Witness David E. Williams in Docket No. N2006-1 at pages 546 and 547 would appear to indicate that the drive for getting the mail to the plants earlier is no longer needed.

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Because we've got excess capacity in our
facilities, because we've introduced technology in the
form of optical character readers and very very high

speed automation, because we have the equipment that
provides us much greater depth of sort in our
distribution operations, all those technology changes
have decreased the cycle time, that is that time that
it takes to process mail. We process mail much much
faster to greater depths of sort in our facilities,
and you couple that with the very significant
decreases in single piece first class mail, the fact
that we've got tremendous excess capacity in our
originating operations because our mailers are
dropping deeper and deeper into our system. It's that
operating window that has traditionally been full of
mail with much slower equipment. All those factors
combined have created a great opportunity to have mail
come in later and still allow us to get greater depth
of sort much quicker and to be able to meet the
operating plan of that facility.
It doesn't mean that we've got to change
collection box changes. We're leveraging technology,
taking advantage of the excess capacity to process
this mail within the boundaries of the operating
plans.
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Many collection boxes are collected well after the posted time. This forces mailers to either mail earlier than necessary or forces them to travel to other boxes to receive timely dispatch. The Postal Service should adopt a basic policy that first makes the posted collection time as late as possible to achieve the dispatch on the existing

transportation[7] and then an evaluation should be made to determine if a change is necessary in the transportation.

Paragraph 3.2.3   The "stop-the-clock" comments are covered in the definition of "service performance" above.

Paragraph 3.7.1   The data shown for First-Class Mail performance should be changed to the format that existed several years ago. As part of my comments, I am providing the Excel Spreadsheet for the EXFC results for FY2001 PQ 2. This format should be utilized although I would suggest that the Performance Clusters be sorted by Areas and that a combined area-wide entry also be provided.

The PERCENT ON TIME / MARGIN OF ERROR / AVG DAYS TO DELIVER / MARGIN OF ERROR should be shown for Overnight, Two-day, Three-day, and all mail [Nation] should be shown.

The data should be shown to two decimal points. This is needed to provide the distinction that is not shown when the data is provided to the nearest whole percent.

Paragraph 9.4 = Post Office Box Service.

The proposal leaves out the other half of the process, namely, how is the posted "uptime" determined? The posted uptime should be determined by an evaluation of the actual times that the box mail is available. There appears to be an incentive to make the uptime later so that it will improve the EXFC performance for mail being sent to a box address at that facility. For example, the Northern New Jersey District has established a District-wide PO Box uptime of 11 AM even though the mail is normally up well before that.[8] The actual "uptime" should be tabulated for a significant number of

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[7]   For example, having a final collection time in front of the post office of 10 AM on Saturday when the final dispatch on Saturday is 5 PM [so that mail collected by carriers on their route can be dispatched the same day]/

[8]   An EXFC mailpiece in an NNJ District PO Box would not be "late" until 11 AM. It also forces boxholders to delay picking up the mail until after 11 AM to be "guaranteed" to have it all.

days and then the "uptime" for that facility would be the time that includes most[9] of the actual times. Consideration should also be given to having a separate "uptime" for Saturdays vs. weekdays.

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[9] Perhaps as high as 98%.