



**PUBLISHERS
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Postal Regulatory Commission
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Celebrating 50 Years of Serving Customers

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Postal Regulatory Commission
901 New York Ave NW, Suite 200
Washington DC 20268-0001

**Re: Comments on Docket No. PI2008-1
Service Performance Measurement Systems for Market Dominant Products**

Dear Mr. Chairman and Members of the Commission,

Publishers Clearing House would like to provide commentary relative to the proposed service performance measurement systems for market dominant products. As a major direct marketer who uses the USPS mail stream as the predominant channel for promotions, to deliver all customer billing, and exclusively for product fulfillment, service performance measurements are critically important to us.

1. The Postal Service proposes aggregate performance measurement reporting by mail class. **Letter, flat and parcel handling and delivery expectations are very distinct from one another and should be reported separately within each mail class.** Letters, flats and parcels are processed on unique equipment and handled differently throughout the network encompassing induction, movement within the facilities and upon delivery. In the Business-to-Consumer relationship, expectations on parcel delivery and letter / flat delivery are very dissimilar. Early delivery is not desirable for letter and flat solicitations; whereas, with parcels, the sooner the delivery the better as these parcels are for goods ordered by consumers.

Additionally, at less than 1% of total Standard Mail volume, the proposal for Standard Mail parcels to be rolled into the aggregated Standard Mail class measurement based on percent of mail provides essentially zero visibility for Standard Mail parcels. Thus the proposed measurement system would be of no value to Standard parcel shippers and as such would not meet the intention of the Postal Accountability and Enhancement Act.

2. **The Postal Service and industry need to work together to overcome adoption barriers to Delivery Confirmation barcodes on small parcels. This will also help to insure that the data collected is appropriately representative across the mix of parcels which comprise the market dominant universe:** First Class parcels, Standard Machinable parcels, Standard Irregular parcels, Standard Not Flat Machinable parcels, Bound Printed Matter parcels, Media Mail parcels, Library Mail parcels and single-piece Parcel Post. There are two known barriers for many parcel mailers: the height of the Delivery Confirmation barcode (compared to the limited real estate on small parcels) and the present lack of standardized parcel-specific electronic manifests from presort software suppliers to facilitate "start the clock" data capture.

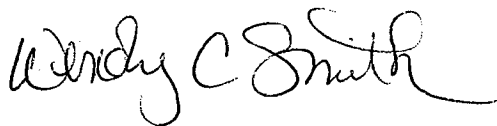
From Our House to Your House

It is suggested that a review of how well each parcel category is represented be conducted within a year of collecting performance data.

3. The USPS states, "The existing Delivery Confirmation performance reports for mail originating at postal retail units can be used in the short-term to measure the service performance of all Package Services until service measurement can be extended to Presort parcels." **The Delivery Confirmation data already available for each category of Package Services should be used. If the short term projection of data availability is not deemed valid then the Delivery Confirmation data on Parcel Select performance should be used as a proxy.** Package Services are entered into the postal network in a similar manner to Parcel Select. Retail window induction is entirely different and as such, does not serve as an appropriate proxy. The retail performance is also very poor, meeting the standards less than 60% of the time and thus would understate performance for Presort parcels.
4. In addition to the quarterly class-level District Level reporting, **reporting by 3-digit ZIP origin / destination pairs is needed for proper mailer planning and service issue resolution.** Distinction between origin-based and destination-based entry should also be made.
5. **Mailers should also have access to 3-digit ZIP pairing data for their profile of mail** assuming Intelligent Mail Barcodes / Delivery Confirmation Barcodes are used. A generic web-based system with drill down capabilities is suggested to avoid tailoring (and cost) at the mailer level.
6. Among the Special Services, **service performance should be measured for Caller Boxes.** This should be measured and reported separately from PO Box up-time given the different nature of mail. Caller Box service is for large remittance processors where the designated time access time to pick up this mail is arranged through negotiation between the USPS and mailers. Measurement can be aggregated across mailers.
7. **Protocol needs to be identified as to how service issues will be addressed.**

Your consideration of these comments is appreciated.

Respectfully,



Wendy C. Smith
Assistant Vice President, Fulfillment & Postal Affairs