

**BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, DC 20268**

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**Service Performance Measurement  
Systems For Market Dominant Products**

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**Docket No. PI2008-1**

**COMMENTS OF  
THE BANK OF AMERICA CORPORATION  
(January 18, 2008)**

The Bank of America Corporation (“BAC” or “the Bank”) strongly supports development and implementation of service standards and service performance measurement for all classes of mail. What gets measured gets attended to. More reliable, predictable delivery enhances confidence in the mail system, increasing its value to the entire mailing community. We appreciate the opportunity to provide comments on the proposal of the Postal Service (“the Service”) to measure and report mail delivery performance results.

**Information Security** – The proposed service performance measurement system, in collecting new information and pulling together previously disconnected and disparate information, could increase the vulnerability of either the Service’s internal systems or its data exchange protocols. The Service and its customers need to assure themselves that this has not inadvertently occurred. Thus, for the sake of information security protocol, the Bank and the Service would benefit by examining details of the data security for the entire measurement system.

**Critical Entry Times** - Critical Entry Times (“CETs”) are a fundamental component of service performance measurement because they determine when

the clock ends for that day's mail entry. Thus, accountability demands detailed CET data. The absence of detailed data regarding Critical Entry Time would raise concerns of data integrity. In many instances, the Service can provide some flexibility in CETs without adversely affecting their own performance and this flexibility will allow mailers to optimize their own operational interface with postal operations. Given the principle that 'change is a constant,' it would be mutually useful to understand and establish a 'change process' for CETs and a method for communicating these changes.

**Remittance Mail** - While CETs typically refer to outbound mail, there is a similar concept applicable to remittance mail and its dependency on the Postal Service's network processing procedures. Remittance mailers dispatch couriers to pick up mail from the Service multiple times a day, in some cases as frequently as hourly. Availability is based on when the Postal Service sorts remittance mail and then when the courier can pick it up. These CET analogs also need to be flexible and to be communicated. Consistency and predictability in the availability of remittance mail has a critical impact on managing the payment processing operation designed to meet customer service level agreements ("SLAs") and managing the appropriate staff based on the volume in the mail workflow.

We recognize that the availability of remittance mail is largely dependent on when the Service processes remittance mail on their equipment throughout the postal network. A standardized schedule for remittance availability, perhaps at the district level, would be a reasonable approach to bridging the gap between the USPS and mailer needs. In summary, it is both reasonable and necessary for the Service to establish service standards and provide performance measurement for remittance mail as a distinct category of First- Class Mail.

**Special Services – Caller Service** - The proposed service standards for caller service need to be expanded. The measurement of PO Box uptime is insufficient to properly manage a payment processing site because most of these sites need to pick up mail from the Service multiple times a day. A single PO Box uptime does not reflect the business customer need for the remittance mail to be available for pick up.

**Special Services - Address Change Service** -- We continue to urge the Service to establish service standards and provide service performance measurement for address change processing. The mobility of the United States population makes it challenging for the Service and mailers to keep up with the current addresses for our mutual customers. The National Change of Address program is a critical tool in assisting citizens to proactively provide updated address information. Standards for and measurement of the time elapsed between the filing of address changes and their implemented would provide confidence in the change process, ensuring that NCOA continues to be an effective tool for citizens and business customers of the postal service. -A service standard performance measurement for address changes should be an important foundation to both the Service's corporate automation plan and its target to reduce Undeliverable-as-Addressed mail by 50 percent by 2010.

**Reporting** - As an active member of the postal community, BAC is surprised by the absence of shape-based reporting. Mailers will benefit from understanding the performance differences between letter-shaped mail and flat-shaped mail, for example, informing decisions of format choice and enabling resource management of call centers. The mailing community needs the Service to reconsider this aggregate reporting limitation and agree to report mail delivery performance by shape.

The Postal Service should provide web-based access to reporting data in the level of granularity (the 3-digit level) currently provided in the service standard

discs, allowing mailers the ability by product, by shape and by 3-digit origin/destination pairs to compare the service standard to the actual service achieved.

The Postal Service asserts its intent to use the EXFC First-Class Single Piece Letter and Flats performance as a proxy for Presort Flats. There ought to be sufficient IMB coded flats in the system such that a proxy is not necessary. We invite the Service to consider eliminating the proxy in the reporting service performance measurement plan.

**Tail of the Mail** -- The tail of the mail is insufficiently reported in the proposed Quarterly reporting formats. We urge the Service to report mail variance until delivery reaches 99 percent. The current proposal to cut off reporting three (3) days beyond the standard does not support our mutual need to create consistency. We also request the Service provide reporting that reflects “early mail delivery”—e.g., mail that is delivered in two days where the standard is three days.

**Service Improvement Issues** - We agree with the position articulated in the MTAC 114 report and outlined in PostCom’s comments: “where service standards are not met, the workgroup recommended that the Postal Service provide explanatory footnotes detailing contributing issues and corrective actions to be taken.”

We will continue to encourage the Service to leverage its relationship in the International Post Corporation (IPC). As articulated in the Research International comments, there are lessons to be learned from our postal colleagues elsewhere in the world.

We look forward to working with the Service, the Postal Regulatory Commission, and our industry colleagues in developing and implementing service standards

and a service performance measurement that meet our mutual needs. Such a system will benefit mail users, the Postal Service, and the entire nation.

Respectfully submitted,

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