

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

SERVICE PERFORMANCE MEASUREMENT
SYSTEMS FOR MARKET DOMINANT PRODUCTS

DOCKET NO. PI2008-1

REPLY COMMENTS OF DAVID B. POPKIN

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Respectfully submitted,

PRCPI20081REPLYCOMMENTS

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

The PRC Public Representative Initial Comments discuss the problems that would exist in the evaluation of the timely delivery mail to a Post Office Box.¹ These comments indicate the possibility of manipulation of the data caused by a premature scanning of the internal box section barcode indicating that the box mail has been completely delivered. The Public Representative suggests that the Postal Service utilize the EXFC program to determine a potential early scan of the delivery completed barcode.

Unless the EXFC post office box reporter made several trips to check their post office box mail, it would not be possible to determine an early scan. For example, I will use the 11 AM uptime that exists at my post office box. Any activity that takes place prior to 11 AM would not be observable. An EXFC reporter should not check the mail

¹ PR Initial Comments at 52

until 11 AM for purposes of the EXFC program: so whether the mail was up by 9 AM, 10 AM or 10:59 AM and whether the scan was actually made at the completion of the delivery would not show in the EXFC results.

If the EXFC reporter picked up the mail at 11 AM on Monday and did not pick up the mail again until Tuesday, a letter that had been placed in the post office box at 11:30 AM on Monday would be tallied as having been delivered a day late on Tuesday and there would be no way to determine otherwise.

If the EXFC reporter did not pick up the mail until 1 PM on Monday, there is no way to determine whether all of Monday's mail was available prior to 11 AM or some was placed in the box between 11 AM and 1 PM.

The EXFC will be a valuable tool to determine the timeliness of mail being delivered to post office box addresses. However, it would appear that determining the proper scanning of the internal delivery completed barcode will require other confirmation means.