

Before the
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Temporary Waivers from Periodic)
Reporting of Service Performance)
Measurement)

Docket No. RM2011-1

PUBLIC REPRESENTATIVE MOTION FOR
ISSUANCE OF INFORMATION REQUEST

(October 12, 2010)

The Public Representative hereby files this motion, pursuant to Rule 3001.21(a), requesting issuance of a Commission Information Request (CIR) to obtain information necessary to fully understand the plans, timing and other factual bases relied upon by the Postal Service in support of its request for temporary waivers from periodic reporting of service performance measurement.¹ The Commission has previously recognized that participants, including the Public Representative, may indentify issues for Commission consideration that should be raised in a formal request, such as a CIR.² Therefore, the Public Representative requests that the Commission issue a CIR directing the Postal Service to report to the Commission and the public their answers to the following questions:

¹ See United States Postal Service Request for Temporary Waivers From Periodic Reporting of Service Performance Measurement (herein "USPS Request"), October 1, 2010.

² See Docket No. R2010-4, POIR No. 5, August 18, 2010.

1. Commission Rule 3055.20(a) and 3055.45(a) require the annual and quarterly periodic reporting, respectively, of service performance measurement for First-Class Mail Single-Piece Letters/Postcards, Bulk Letters/Postcards, Flats, and Parcels. In its Request at page 3, the Postal Service states that it “will be able to report as required in all of these product categories beginning in quarter 4 of FY2011, with two exceptions: Flats [quarterly] at the district level and non-retail Parcels.” At page 4, the Request states that “Reporting on Flats performance at the district level will begin in Quarter 2 of FY2011.” Please explain why the Postal Service is unable to begin periodic reporting of service performance measurement for the larger (in volume) First-Class Mail Single-Piece Letters/Postcards product and the Bulk Letters/Postcards product in quarter 2 of FY2011, at the same time as the First-Class Mail Flats product.
2. In its Request at pages 3 and 4, and in footnote 10, the Postal Service explains the need to expand EXFC sampling and reporting to provide quarterly district-level periodic reporting of service performance measurement for the First-Class Mail Flats product, stating that it “currently estimates the cost of these EXFC modifications at approximately \$4 million per year.” Please explain the basis for, and provide all documentation and electronic files, including such documents and files from the EXFC contractor, which supports the Postal Service’s current cost estimate.
3. In its Request at pages 4 and 5, the Postal Service “considers [First-Class Mail Parcels with Delivery Confirmation accepted over the counter at retail units] to be a reliable proxy measurement for the entire First-Class Mail Parcels product category.” The Market Dominant Product List identifies First-Class Mail Parcels as the product, and does not distinguish between retail and commercial parcels. Moreover, Commission Rule 3055.20(a) and 3055.45(a) require the periodic reporting of service performance for First-Class Mail Parcels as a whole. Separate reporting of retail and commercial parcels is not required.
 - a. Please confirm that the Postal Service’s proposed quarterly reporting at the national, area and district levels for First-Class Mail Parcels, based upon First-Class Mail Parcels with Delivery Confirmation accepted at retail units, satisfies the requirements of Rule 3055.45(a). If not confirmed, please explain.
 - b. Please explain why the Postal Service intends to incur the additional expense of system changes and the expenses associated with collecting and reporting the service performance measurement of commercial First-Class Mail Parcels as a separate item in its quarterly periodic reports.

4. In its Request at page 5, the Postal Service references its document Service Performance Measurement, June 2008, concerning commercial mailers use of Delivery Confirmation and electronic mailing documentation listing the unique Delivery Confirmation barcodes used to “start-the-clock” for service performance measurement of First-Class Mail Presort (commercial) parcels. The Postal Service further states that it “would propose new business rules for starting-the-clock.”
 - a. Please explain the current “business rules for starting-the-clock” now applicable to First-Class Mail commercial parcels. Also, please explain how the current business rules differ from the business rules described in the Postal Service’s Service Performance Measurement document.
 - b. Please explain why the Postal Service no longer intends to apply the business rules for starting-the-clock described in the Service Performance Measurement document to measure the service performance of First-Class Mail commercial parcels. Specifically, what occurred to cause the Postal Service to propose changing the business rules for starting-the-clock as described in the Service Performance Measurement document?

5. In its Request at pages 6 and 7, the Postal Service states that “approximately half of the Full-Service Intelligent Mail®-barcode volume uses [Postal Wizard or the Intelligent Mail Range Record (IMR)] documentation methods.” According to the Postal Service, such documentation methods “do not allow Postal Service systems to distinguish each mailpiece’s product category.” [footnote omitted] This means that approximately half of the Full-Service Intelligent Mail®-barcode (IMb) volume in Standard Mail uses other documentation methods which allow the identification of each mailpiece’s product category. Please explain why the Commission should not require the Postal Service to provide the required service performance measurement for each Standard Mail product, disaggregated by Destination Entry and End-to-End categories, at the district, area, and national levels based upon the half (approximately) of Full-Service Intelligent Mail®-barcode volume that can be distinguished by product, along with a statement describing the nature of the “significant bias” likely to be introduced into the measurement results based upon such IMb volume.

6. In its Request at pages 7 and 8, the Postal Service discusses its proposal “to subdivide the Standard Mail NFM/Parcels product and transfer a portion of it to the competitive product category.” In the event the Commission does not approve the Postal Service’s proposal, please explain the method the Postal Service will use to measure the service performance of Standard Mail NFMs/Parcels.

7. Commission Rule 3055.50 requires the quarterly reporting of service performance measurement for each Standard Mail product, disaggregated by Destination Entry and End-to-End categories, at the district, area, and national levels. In its Request at pages 8 and 9, the Postal Service prefaces its proposed alternative “framework” (table) for the periodic reporting of Standard Mail service performance measurement with the qualification that the alternative framework will remain in place “[u]ntil the requisite level of detail is available for at least 80 percent of the Standard Mail pieces with Full-Service Intelligent Mail®-barcodes.”
 - a. Pursuant to Order No. 465 at 22 - 23, the Postal Service is required “to develop and present implementation plans addressing each reporting requirement for which the Postal Service cannot provide the required information.” For each Standard Mail product, please provide an implementation plan that lists each quarterly reporting requirement in Commission Rule 3055.50 for which the Postal Service cannot provide the required information, identifies each step necessary to come into compliance with the quarterly reporting requirement, and provides a timeline of events necessary to achieve compliance with each quarterly reporting requirement, including interim milestones to permit the evaluation of progress toward achieving compliance.
 - b. Please explain the basis for, and provide all documentation and electronic files which justify, the Postal Service’s threshold that “at least 80 percent” of Standard Mail pieces with Full-Service IMb contain information that permits each mailpiece to be distinguished by product.
 - c. Please identify the Standard Mail products to which the 80 percent threshold for product-identifying information applies.

8. Commission Rule 3055.55 requires the quarterly reporting of service performance measurement for Within County, Outside County Destination Entry, and Outside County End-to-End Periodicals at the area and national levels. In its Request at page 11 and 12, the Postal Service states:

Beginning in Quarter 1 of FY2011, the Postal Service proposes to report on Periodicals service performance in the Destination Entry and End-to-End categories of Periodicals until at least 80 percent of the Full-Service Intelligent Mail® Periodicals data has the information necessary to determine whether each piece is Within County or Outside County. Until that milestone is reached, the Postal Service will use the mailings for which this piece-level information is available to describe the population of available data.

- a. Pursuant to Order No. 465 at 22 - 23, the Postal Service is required “to develop and present implementation plans addressing each reporting requirement for which the Postal Service cannot provide the required information.” For each Periodicals product, please provide an implementation plan that lists each quarterly reporting requirement in Commission Rule 3055.55 for which the Postal Service cannot provide the required information, identifies each step necessary to come into compliance with the quarterly reporting requirement, and provides a timeline of events necessary to achieve compliance with each quarterly reporting requirement, including interim milestones to permit the evaluation of progress toward achieving compliance.
- b. Please explain the basis for, and provide all documentation and electronic files which justify, the Postal Service’s threshold that “at least 80 percent” of the Full-Service IMb for Periodicals contains the information necessary to determine whether each piece is Within County or Outside County.
- c. Until the 80 percent threshold is reached, please explain in greater detail how the Postal Service intends to use the available “piece-level information” concerning Within County and Outside County.

Respectfully submitted,

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