

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

TEMPORARY WAIVERS FROM PERIODIC REPORTING
OF SERVICE PERFORMANCE MEASUREMENT

Docket No. RM2011-1

**NOTICE OF ERRATA TO RESPONSES OF
THE UNITED STATES POSTAL SERVICE TO
CHAIRMAN'S INFORMATION REQUEST NO. 1, QUESTIONS 5 AND 9**
(November 19, 2010)

On November 12, 2010, the United States Postal Service filed its responses to Chairman's Information Request No. 1 in this proceeding. Further review and consultation with Commission staff at the November 17, 2010, technical conference have revealed aspects of the responses to questions 5 and 9 that bear further clarification. A corrected version of the relevant responses is provided here.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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November 12, 2010

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5. Please explain why it is necessary to change the First-Class Mail Parcels (non-retail) start-the-clock from a system based on commercial mailer documentation to one based on the first en-route scan of the mailpiece. Please describe the impact that this change will have on the reliability of an end-to-end service performance measurement. Does the Postal Service intend for the change in start-the-clock to be a permanent or a temporary change? If the intent is for it to be a temporary change, please provide a timeline for implementing the system based on commercial mailer documentation and acceptance.

RESPONSE

Use of the first en-route scan to start-the-clock for FCM commercial parcels is a permanent change. Experience with customer electronic documentation for parcels indicates issues with the quality of the data provided. Although the quantity and destination information for the parcels may be accurate, the entry date, time, and/or location sometimes do not match the documentation. Using customer documentation introduces risk and inaccuracies in service measurement when the clock starts for pieces that have not been tendered to the Postal Service or have not arrived at the proper Postal Service facility as specified in the electronic documentation. Such discrepancies could cause service performance calculations to be inaccurate. When these types of discrepancies are detected, all pieces associated with the suspect electronic documentation file are excluded from measurement, reducing the volume that could be measured. Using the first en-route scan as the start-the-clock event would allow a greater number of pieces to be measured, because only individual pieces with discrepancies would be excluded from measurement, without affecting the measurement of other pieces that happen to be listed on the same documentation.

The Postal Service pursued using FAST appointments to start the clock for commercial parcel shipments and took steps to program its systems toward this end. However, discussions with parcel shippers indicated that it would be operationally infeasible for those shippers to include the FAST

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appointment number in their electronic documentation or to include their electronic file number in the FAST appointment. In addition, parcel shipments using Electronic Verification System (eVS) for payment do not require verification at origin bulk mail entry or detached mail units. As a result, processes used to start the clock in these units are bypassed.

Except for sacked items, the majority of parcels receive individual piece handling during sorting shortly after arrival at the origin or entry processing facility. When these parcels are sorted on equipment or in operations with scanning capabilities, an en-route event is captured, recording the date, time, and ZIP Code the physical parcels were processed at a given location. Using a physical scan event provides a method to measure parcels that actually exist, which will include more pieces in measurement and avoid excluding pieces because of electronic documentation discrepancies.

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9. Please confirm that the Postal Service is seeking to use all Periodicals as a service performance reporting proxy for Outside County Periodicals (without differentiating between Destination Entry or End-to-End) until 80 percent of the Full-Service IMb data has sufficient information to distinguish whether a mailpiece is Within County or Outside County. If not confirmed, please clarify the Postal Service's proposal.

RESPONSE

Not confirmed. To clarify, the Postal Service intends to use all Destination Entry Periodicals as a proxy for Outside County Destination Entry Periodicals and to use all End-to-End Periodicals as a proxy for Outside County End-to-End Periodicals beginning in Quarter 1 of FY2011. If the data are available to identify a piece as Within County and therefore exclude it from Outside County Periodicals measurement, the piece will be excluded. However, where the limited data in electronic documentation prevents the Postal Service from determining whether a piece is Within or Outside County, the assumption will be that the piece is Outside County. The service performance reports will provide detail descriptions about this assumption.