

Before the
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Temporary Waivers from Periodic
Reporting of Service Performance
Measurement

Docket No. RM2011-7

PUBLIC REPRESENTATIVE COMMENTS
IN RESPONSE TO ORDER NO. 664

The Postal Service has requested waivers for reporting certain service performance information.¹ The Postal Service states that mailers have been providing inaccurate dates and times in their documentation accompanying Full Service Intelligent Mail mailings. These inaccuracies affected the reliability of service performance measurements for Presort First Class, Standard Mail, and Bound Printed Matter Flats. In addition, the Postal Service has not been able to use Intelligent Mail barcodes to measure service performance of Periodicals. This is due to the lack of use of Full Service Intelligent Mail by Periodicals mailers. Request at 1, 5.

The waivers requested in this proceeding are in addition to waivers and exceptions requested in Docket Nos. RM2011-1 and RM2011-4. The basic problem seems to be an inability or unwillingness of mailers to utilize Full Service Intelligent Mail. This ongoing problem suggests that reliance on Intelligent Mail for service performance measurement may be misplaced. The Postal Service is now in the process of certifying mailers to use IMb properly. However, this certification process has been slow and cumbersome.²

The Postal Service has requested indefinite relief from service reporting requirements. The Service proposes not to report service performance for a given shape and entry level until 50 percent of districts achieve performance scores with a

¹ United States Postal Service Request for Temporary Waivers from Periodic Reporting of Service Performance Measurement, February 3, 2011 (Request).

² See Request at 2-3.

certain level of statistical precision. *Id.* at 3. Such statistical precision is in turn dependent on mailers' use of Full Service Intelligent Mail. Because of this dependency, the Postal Service has not offered a plan for compliance by certain dates. The Postal Service's desired precision may not be achievable in the near future.³ The Commission should require a compliance plan with definite dates. The Commission should also consider accepting service performance measurements with a lesser degree of precision or reconsider the whole concept of using Intelligent Mail to measure service performance.

Respectfully submitted,

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³ The desired precision for Periodicals is somewhat unclear. "[T]he Postal Service specifically requests a temporary waiver for quarterly reporting of End-to-End Periodicals in areas with precision of greater than +/-4 percent in Quarter 1 and each subsequent Quarter, until a significant number of mail [sic] from certified Full-Service Intelligent Mail users is available for measurement or until sufficient data exist in those areas to allow for statistical precision below that threshold. The Postal Service proposes that this threshold be met when the Full-Service Intelligent Mail includes 35 publications . . . and 10 percent of the total annual circulation of those publications . . ." *Id.* at 7. There appear to be two alternative thresholds proposed, one of which is not based on estimated precision. It appears that meeting either threshold would trigger reporting of service performance at the area level.