

UNITED STATES OF AMERICA  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

Annual Compliance Report

Docket No. ACR2010

CHAIRMAN'S INFORMATION REQUEST NO. 4

(Issued February 18, 2011)

To clarify the basis of the Postal Service's estimates in its FY 2010 Annual Compliance Report (ACR), filed December 29, 2010, the Commission requests the Postal Service to provide written responses to the following questions. Answers should be provided to individual questions as soon as they are developed, but no later than February 28, 2011.

**Standard Mail**

1. On page 23 of the ACR, the Postal Service states that ratio of the revenue per piece of NonProfit to Commercial Standard Mail was 64.5%. The following questions concern the calculation of this ratio.
  - a. Please confirm the NonProfit to Commercial ratio of 64.5% is calculated using USPS-FY10-4 file "Standard BDs 2010.xls" tab "Summary 2 P. G6-2" cells g54 and g17. ( $.1328/.2058=.645$ ).
  - b. Please confirm the ratio can be calculated as shown in the table below using values in USPS-FY10-LR4 file "Standard BDs 2010.xls" tab

“Summary 3 P. G6-3”

<b>Tab Summary 3 P. G6-3</b>		
<b>Commercial</b>		
<b>Revenue</b>	<b>Volume</b>	
<b>Formula</b>	<b>Formula</b>	
cells F10+F22	cells H10+H22	
<b>Value</b>	<b>Value</b>	<b>Revenue Per Piece</b>
15,428,689,581	69,142,263,915	0.223
<b>NonProfit</b>		
<b>Revenue</b>	<b>Volume</b>	
<b>Formula</b>	<b>Formula</b>	
cells F37+F42	cells H37+H42	
<b>Value</b>	<b>Value</b>	<b>Revenue Per Piece</b>
1,766,662,080	13,107,926,624	0.135
<b>NonProfit to Commercial Revenue Per Piece Ratio</b>		
60.4%		

- c. Please reconcile the discrepancy between the NonProfit/Commercial revenue per piece ratios calculated using tabs USPS-FY10-LR4 file “Standard BDs 2010.xls” “Summary 2 P. G6-2” and “Summary 3 P. G6-3.”
  
- 2. Library Reference-USPS-FY10-27 contains estimates of Nonprofit Standard Mail unit costs, total costs, and contribution. The attached spreadsheet applies the FY10-27 methodology to the FY10 Commercial Billing Determinants. It contains the cost for Commercial and Nonprofit Standard Mail by product using both data from the Cost and Revenue Analysis (CRA) and developed using the FY10-27 methodology.

	Total Cost By Product			% Difference
	NonProfit Model	CRA	NPM-CRA	
<b>High Density and Saturation Letters.....</b>	329,136,538	348,527,524	(19,390,987)	-5.5637%
<b>High Density and Saturation Flats and Parcels..</b>	745,653,571	825,826,991	(80,173,420)	-9.7083%
<b>Carrier Route.....</b>	1,533,360,168	1,559,827,920	(26,467,752)	-1.6968%
<b>Letters.....</b>	5,095,363,957	5,106,086,248	(10,722,291)	-0.2100%
<b>Flats.....</b>	3,254,405,523	3,161,327,019	93,078,504	2.9443%
<b>Not Flat-Machinables and Parcels.....</b>	780,954,782	780,156,163	798,619	0.1024%
<b>Total</b>	<b>11,738,874,539</b>	<b>11,781,751,866</b>	<b>(42,877,327)</b>	<b>-0.3639%</b>

- a. Please discuss whether it would be reasonable to apply a CRA adjustment factor to the FY10-27 cost estimates by product such that the total costs estimated by product using FY10-27 align with the costs for each product as reported in the CRA. The following table shows the CRA adjustment by product.

	NonProfit Model	CRA	CRA/Nonprofit Adjustment	Nonprofit Model x Adjustment
<b>High Density and Saturation Letters.....</b>	\$ 329,136,538	\$ 348,527,524	1.059	\$ 348,527,524
<b>High Density and Saturation Flats and Parcels..</b>	\$ 745,653,571	\$ 825,826,991	1.108	\$ 825,826,991
<b>Carrier Route.....</b>	\$ 1,533,360,168	\$ 1,559,827,920	1.017	\$ 1,559,827,920
<b>Letters.....</b>	\$ 5,095,363,957	\$ 5,106,086,248	1.002	\$ 5,106,086,248
<b>Flats.....</b>	\$ 3,254,405,523	\$ 3,161,327,019	0.971	\$ 3,161,327,019
<b>Not Flat-Machinables and Parcels.....</b>	\$ 780,954,782	\$ 780,156,163	0.999	\$ 780,156,163
<b>Total</b>	<b>11,738,874,539</b>	<b>\$ 11,781,751,866</b>		<b>\$ 11,781,751,866</b>

- 3. On page two of the Preface to USPS-FY10-7, the Postal Service states “In FY 2010, the FSS operations continue to be (as they were in past years) listed with the AFSM operations until the FSS hours become substantial enough at some time in the future to have their own separate cost pool.”
  - a. How many FSS machines were in operation in FY 2010
    - i. For the entire fiscal year; and
    - ii. For part of the fiscal year.
  - b. Please provide the workhours associated with FSS operations. If unavailable, please provide a timeline containing when FSS hours will become substantial enough to have their own cost pool.

- c. Please provide an estimate of the MODS Productivity of the FSS, as would be developed in USPS-FY10-23 (MODS Productivity Data). If unavailable, please provide a timeline containing when FSS hours will become substantial enough to estimate productivity.

### **Special Services**

4. Library Reference USPS-FY10-4, Excel file 'Special Services FY2010 BD.xls,' does not contain billing determinant data for the Stamped Fulfillment Services product. Please file a revised file that contains billing determinant data for Stamp Fulfillment Services (SFS). If possible, please indicate the volumes and revenues for the following rate categories listed in the Mail Classification Schedule for the SFS product:
  - a. Orders mailed to domestic United States destinations;
  - b. Custom orders mailed to domestic United States destinations;
  - c. Orders mailed to destinations outside of domestic United States; and
  - d. Custom orders mailed to destinations outside of domestic United States.
5. In Docket No. MC2009-19, the Postal Service explained that it is working on a methodology to allocate revenues and expenses between Stamped Fulfillment Services and Philatelic Sales products when it receives combined orders for stamps and philatelic items.<sup>1</sup> Please provide an update on the Postal Service's efforts to develop a methodology to allocate the revenue and expenses for combined orders. If a methodology has not been developed, please approximate

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<sup>1</sup> Docket No. MC2009-19, Response of the United States Postal Service to Chairman's Information Request No. 3, question 3, June 1, 2010.

the allocation of revenue and expenses for combined orders of stamps and philatelic items.

6. The FY 2010 Public Cost Revenue and Analysis Report (PCRA) shows the revenue and cost for SFS. (See Excel file FY10PublicCRA.xls, worksheet Cost2, line 28). In Docket No. MC2009-19, the Postal Service explained that SFS only includes the fulfillment of stamp orders.<sup>2</sup>
  - a. Please confirm that the revenue and cost figures of \$3,069,349 and \$5,778,908, respectively include the fulfillment of the following three types of orders:
    - i. Stamps;
    - ii. Philatelic Sales; and
    - iii. Combined orders of stamps and philatelic sales.
  - b. If confirmed, please provide the revenue and cost for the SFS product that does not include the nonpostal Philatelic Sales product.
  
7. The ACR (at 66) states: “Comparing the revenue of each competitive product shown in the Nonpublic CRA (USPS-FY10-NP11) with its attributable costs suggests that all of the competitive products are covering their attributable costs, with the exception of: Inbound International Expedited Services and Competitive International Insurance.” However, for Address Enhancement Service, the Nonpublic CRA shows that revenue does not cover attributable costs (See Excel file FY10NonPublicCRA.xls, worksheet Cost 3, line 34). Please discuss the

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<sup>2</sup> Docket No. MC2009-19, Request of the United States Postal Service to Add Stamp Fulfillment Services to the Mail Classification Schedule in Response to Order No. 391, April 26, 2010, at 1.

factors that contributed to the attributable costs for this product exceeding the revenues and how the Postal Service plans to improve the cost coverage.

### **International Mail**

8. Please refer to the response to CHIR No. 2, question 1, in subpart a., which states that the “Reports (Booked).xls file uses RPW as its booked basis and RPW reports only revenue, no pieces.” In subpart b., the Postal Service further states that “the number of transactions reported in Chapter 9 is accurate for calculations of the Imputed Reports.xls version.”
  - a. Please explain why the Postal Service did not report any transactions for inbound market dominant Registered Mail in the Excel file Reports.xls, the imputed version.
  - b. Notwithstanding the fact that neither the RPW nor the Excel file Reports (Booked).xls provide the number of inbound Registered Mail pieces, please confirm that the number of pieces reported under the “booked” methodology would be the same as reported in Chapter 9. If not confirmed, please explain.
  
9. Please refer to the response to CHIR No. 2, question 9, which states that “Inbound Surface Parcel Post costs for mail processing were reported as Expedited Parcels for the entire fiscal year...[while] costs for nonmail processing were reported as Inbound Surface Parcel Post (at Non-UPU rates) for Quarter I....” Please explain why the Postal Service did not segregate Quarter 1 mail processing costs and report those costs along with Quarter 1 nonmail processing costs for Inbound Surface Parcel Post (at Non-UPU rates) in Quarter 1. Also, please provide the Quarter 1 mail processing costs for Inbound Surface Parcel Post (at non-UPU rates).

10. The following questions concern the service performance of inbound First Class Mail International (FCMI) and inbound Express Mail Service (EMS). In November 2010, the Transportation Security Administration implemented new security directives related to the entry of international mail.
  - a. Please explain to what extent (if any) these new security directives will affect the December 2010 monthly and the CY 2010 annual quality of service measurement results for the link to terminal dues for inbound FCMI, and the CY 2010 Quarter 4 EMS Cooperative Report Card, and the CY 2010 Annual EMS Cooperative Report Card.
  - b. In addition, please provide an estimate of the possible financial effect of these new security directives on each product.
  
11. The following questions concern International Money Transfer Service (IMTS). Please refer to USPS-FY10-NP2, and the Excel file "Reports (Booked).xls," worksheet tab A-Pages (c), Table A-2.
  - a. For FY 2010, "booked" revenues for IMTS increased by 38.8 percent, while volumes decreased by 18.7 percent, compared with FY 2009. Please discuss the factors that caused this increase in revenues.
  - b. For FY 2010, please explain why "booked" revenues for IMTS equal "imputed" revenues, as shown in the Excel file "Reports.xls, worksheet tab A-Pages (c), Table A-2. This contrasts with the results reported by the Postal Service for FY 2009, where "booked" revenues for IMTS were less than "imputed" revenues. Compare Docket No. ACR2009, USPS-FY09-NP2, and the Excel files "Reports (Booked).xls" and "Reports.xls."

12. The following questions concern competitive International Ancillary Services. In Docket No. ACR2009, the Postal Service observed that within the competitive International Ancillary Services product, outbound Registered Mail, Return Receipt, and Insurance are “relatively small” and therefore “may exhibit annual cost variations associated with small transactional volumes.” Response to CHIR No. 2, question 19(b), February 2, 2010. The Postal Service also stated that it planned to monitor the financial performance of the underlying ancillary services during FY 2010 “to determine whether this year is an anomaly or [an] indication of a trend.” *Id.*
- a. For FY 2010, revenues for Registered Mail and Return Receipt exceeded costs. See USPS-FY10-NP2, and the Excel file “Reports (Booked).xls,” the worksheet tab A-Pages (c), Table A-2. Please discuss the factors that caused revenues to exceed costs for these two ancillary services and, specifically address whether the financial performance of these two ancillary services during FY 2010 was an anomaly or an indication of a trend.
  - b. For FY 2009 and FY 2010, please provide the total number of IOCS tallies for Registered Mail, Return Receipt, and Insurance. In addition, for each of these ancillary services, please provide the coefficient of variation for the cost estimate, and the 95 percent confidence interval for the cost coverage.

13. Please refer to Library Reference USPS-FY10-NP11, and the Excel file FY10NonPublicCRA.xls, worksheet tabs Cost2, Cost3, Volume2 and Volume3. Also, please refer to the response to CHIR No. 1, question 29, which references Library Reference USPS-FY10-NP30, and the Excel file CHIR.1.Q.29.NONPUBLIC.FY2010\_RPWextractfile.xls, worksheet tab RPW Report.
- a. In worksheet tabs Cost2 and Volume2, revenue and transactions for market dominant Total International Ancillary Services are reported in cells D19 and D18, respectively. In worksheet tab RPW Report, revenue and pieces for Outbound International Ancillary Services are reported in cells E89 and M89, respectively, while Inbound International Ancillary Services revenue and pieces are reported in cells E90 and M90, respectively. Please reconcile the sum of revenues and pieces for Outbound and Inbound International Ancillary Services reported in the Excel file CHIR.1.Q.29.NONPUBLIC.FY2010\_RPWextractfile.xls with Total International Ancillary Services revenue and transactions reported in the Excel file FY10NonPublicCRA.xls.
  - b. In worksheet tab Cost3, revenue for Inbound Surface Parcel Post (at non-UPU rates) is reported in cell D51. In worksheet tab RPW Report, revenue for Inbound Surface Parcel Post (at non-UPU rates) is reported in cell E173. Please reconcile the revenue for Inbound Surface Parcel Post (at non-UPU rates) reported in the Excel file CHIR.1.Q.29.NONPUBLIC.FY2010\_RPWextractfile.xls with the revenue for Inbound Surface Parcel Post (at non-UPU rates) reported in the Excel file FY10NonPublicCRA.xls.
  - c. In worksheet tabs Cost3 and Volume3, revenue and pieces for Outbound International Negotiated Services Agreement Mail are reported in cells D52 and D47, respectively. In worksheet tab RPW Report, revenue and

pieces for Outbound International Negotiated Services Agreement Mail are reported in cells E174 and M174, respectively. Please reconcile the revenue and pieces for Outbound International Negotiated Services Agreement Mail reported in the Excel file ChIR.1.Q.29.NONPUBLIC.FY2010\_RPWextractfile.xls with the revenue and pieces for Outbound International Negotiated Services Agreement Mail reported in the Excel file FY10NonPublicCRA.xls.

- d. In worksheet tabs Cost3 and Volume3, revenue and pieces for Inbound International Negotiated Services Agreement Mail are reported in cells D53 and D48, respectively. In worksheet tab RPW Report, revenue and pieces for Inbound International Negotiated Services Agreement Mail are reported in cells E175 and M175. Please reconcile the revenue and pieces for Inbound International Negotiated Services Agreement Mail reported in the Excel file ChIR.1.Q.29.NONPUBLIC.FY2010\_RPWextractfile.xls with the revenue and pieces for Inbound International Negotiated Services Agreement Mail reported in the Excel file FY10NonPublicCRA.xls.
- e. In worksheet tabs Cost3 and Volume3, revenue and pieces for International Money Transfer Service are reported in cells D56 and D51, respectively. In worksheet tab RPW Report, revenue and pieces for International Money Transfer Service are reported in cells E201 and M201. Please reconcile the revenue and pieces for International Money Transfer Service reported in the Excel file ChIR.1.Q.29.NONPUBLIC.FY2010\_RPWextractfile.xls with the revenue and pieces for Inbound International Money Transfer Service reported in the Excel file FY10NonPublicCRA.xls.
- f. In worksheet tabs Cost3 and Volume3, revenue and pieces for competitive International Ancillary Services are reported in cells D57 and D52,

respectively. In worksheet tab RPW Report, revenue and pieces for Outbound International Ancillary Services are reported in cells E195 and M195, respectively, while Inbound International Ancillary Services revenue and pieces are reported in cells E196 and M197, respectively. Please reconcile the sum of revenues and pieces for Outbound and Inbound International Ancillary Services reported in the Excel file ChIR.1.Q.29.NONPUBLIC.FY2010\_RPWextractfile.xls with the International Ancillary Services revenue and pieces reported in the Excel file FY10NonPublicCRA.xls.

14. Please refer to the response to CHIR No. 1, question 21, which references USPS-FY10-NP-2, and the Excel file "Inputs.xls," worksheet tab UPU TDs CY2. Cells I60-I71 and J60-J71 in the worksheet tab associate terminal dues rates of 0.174 SDR per item and 1.76 SDR per kilogram with the following countries, identified by country code: 710, 773, 870, 715, 864, 895, 905, 790, 811, 888, 843, and 868. These terminal dues rates are the CY 2010 provisional rates paid by target system countries. However, the identified countries are new target system countries. Article 28, paragraph 8 of the UPU Convention provides that "the rates applied for flows to, from or between new target system countries, other than for bulk mail," shall be 0.155 SDR per item and 1.562 SDR per kilogram for CY 2010. Please explain why the CY 2010 provisional terminal dues rates of 0.174 SDR per item and 1.76 SDR per kilogram were used for the new target system countries, rather than the CY 2010 new target system country terminal dues rates of 0.155 SDR per item and 1.562 SDR per kilogram.

**MODS/IOCS**

15. USPS-FY10-9-ACR Roadmap contains a discussion (at 89) of USPS-FY10-8 Equipment and Facility Related Costs section, concerning the need to realign the amounts of OCR, MPBCS, DBCS and FSM 1000 space across the LDC 41, LDC 42 and Non-MODS –Automated/Mechanized Facility Space Categories because too much of this equipment had been erroneously categorized as non-plant.
- a. Please describe the estimation process used to assign equipment to space categories prior to FY 2010 and how the space category assignment/calculation changed.
  - b. Please specify the process for determining the space facility categories, how these plant facility space category errors were identified, and what quality control measures are in place to ensure future accuracy of equipment space categorization.
  - c. USPS-FY10-7 indicates (at 2) that LD42 now consists only of MODS business return operations and that in addition to its core automated MODS operations, LD41 also comprises some mechanized MODS operations. In the USPS-FY10-np18part2.xls, between FY 2009 and FY 2010 there have been some addition and deletions in MODS operation numbers and changes in LDC groups. Please provide a table of changed MODS operation numbers (deletions and additions) and changes made to LDC groups between FY09 and FY10.
16. USPS-FY10-8 Preface.doc (section A. Purpose and Content) states (at 1) that estimates of square feet are based on the FY 1999 facility survey updated using information on equipment deployments since FY 1999. USPS-FY10-8 Preface.doc, in section “E. Input/Output” states (at 2) that the FY 2005 sq. feet

and rents operation are from the FY 2004 facility space and rents by operation, and additional facility space data are from the “Facility Space Usage Study.” Also in this same section it states that rental rates per square feet are from the Facility Cost Development Update, December 1993 (USPS LR-G-120 in Docket No. R94-1).

- a. Given that errors have occurred in certain equipment categorization, as noted in the explanation on page 3 in this document (which effected LDCs and facility space assignment), what measures does the Postal Service have planned to prevent further equipment /facility space categorization errors?
- b. For the space estimates based on the older studies referenced in USPS-FY10-8, (the Facility Study in 1999 and the Facility Cost Development Update, December 1993), on what basis is the Postal Service determining these survey data continue to be accurate sources of space estimation?
- c. USPS-FY10-8 Preface.doc states (at 2):

“[a]n estimate of facility space for the new LDC 42 for business return services, **presumably** a former LDC 48 activity, was made by assuming this activity would have the same ratio of total cost pool labor costs to facility space as true for the former LDC 48 as detailed in FCILTY10.xls.” (Emphasis added.) The word “presumably” (bolded above for emphasis) for this estimation of facility space appears to be a qualifier that could be related to accuracy. What checks are in place based around this particular space estimation (as well as for others)?
- d. Please refer to USPS-FY10-LR8. In the FCILTY10.xls file the worksheet called “Notes for Equipment” reads “11/Mechanized Tray Sorter facility space was increased based on rise in workhours....” FY 2005 and FY 2010 MODS work hours are shown for illustration. How frequently does

the Postal Service evaluate MODS work hours and make adjustments for facility space? At what point/magnitude is a decision made to adjust facility space in response to changes in workhours?

17. Please provide an updated M-32 Handbook Management Operating Data System (MODS) to include operation descriptions for the 2010 MODS operation numbers in use.
  
18. The In-Office Cost System (IOCS) Activity Codes List (MASTER.CODES.FY10 filed with USPS-FY10-37) shows changed activity codes in addition to those listed in Appendix A: Changes in IOCS Codes from FY 2009 to FY 2010, Table 1: Changes in Activity Codes (at 14 in the USPS-FY10-37.pdf).
  - a. Please describe what specific changes in FY 2010 were made to the following IOCS activity codes:
    - i. 2425 Combined Media Mail – Presort and Single-Piece;
    - ii. 3060 IPP's under 8 ozs.;
    - iii. 3080 IPP's under 8 ozs. – Nonautomation Presort;
    - iv. 3160 Priority Mail IPP's under 8 ozs.;
    - v. 3493 Parcel Select; and
    - vi. 4493 Parcel Select.

19. USPS-FY10-7 file “USPS-FY10-7 Ndcx – Mods1&2-Other SAS logs.rtf (at 829, line 12770) includes the following message: “The SAS System stopped processing this step because of errors.” The frequency table (activity code by pool) is not produced for: Table 7- ‘ALLIED OPERATIONS – NOTHANDLING IOCS \$ CHECK – EXH 2-10’ ‘EXCL. ADJUSTMENT FOR BREAKS EXH24 R97-1 – PRC-LR-H4’. For continuity and consistency, please provide the table that was the planned output for this programming section and resubmit a corrected log and output file for both LRs USPS-FY10-7 and USPS-FY10-NP-18.

### **Miscellaneous**

20. The FY 2010 Performance Report and FY 2011 Performance Plan provides (at 3) the FY 2011 service performance targets for single-piece First-Class Mail. For all other products, please confirm that the Postal Service’s FY 2011 targets remain the same as those reported in FY 2010. If not, please identify all proposed changes to the FY 2011 service performance targets.
21. In the 2010 Performance Report and 2011 Performance Plan at 5, the Postal Service indicates that a Voice of the Employee survey is a performance indicator for achieving the Postal Service’s strategic goal of “improving employee engagement.” In FY 2010, the Postal Service achieved a score of 62.3 and plans to attain 64.5 for FY 2011.
  - a. Please provide a copy of the FY 2010 survey.
  - b. Please provide the summary statistics of the employee responses to each question and explain how the score of 62.3 was calculated. Include in your response the derivation of all calculated values and cite source documents relied upon.

22. The 2010 Comprehensive Statement on Postal Operations states (at 51): “[t]he many actions underway to achieve the strategic initiatives are described in more detail in the Comprehensive Statement.” For each of the actions underway, have goals been established to identify the success or failure of each? If so, please provide the goals for each action. If not, please explain.
23. A recent USPS OIG survey of Full Service Intelligent Mail Program customers found mixed results for program usefulness (Management Advisory Report – Full Service Intelligent Mail Program Customer Satisfaction Review (Report Number DA-MA-11-001(R)), November 23, 2010). In three of the six benefit categories, one-third of the respondents described the program features as not useful at all. The report also found that the primary reasons mail owners did not participate in the Full Service Program were high start-up costs and limited program benefits. In addition, mail service providers expressed concerns with assistance at the business mail entry units (BMEU) and PostalOne! Help Desk.
- For each of the reasons mail owners do not participate in the Full Service Program, please specify in detail the actions the Postal Service has taken (or proposes to take) to increase Full Service participation and the continuance of those who currently participate.
24. In the USPS-FY10-29-Annual Report on Service Performance for Market Dominant Products, filed 12/29/2010, in Docket 2010 ACR includes an Excel file titled “FY10 ACR Standard Mail.xls”. Within the file, refer to the “Aggregation” worksheet. The end-to-end volumes (mailpieces) between Quarters varies greatly (from a low of 155,633 mail pieces to a high of 38,414,944 mailpieces).

25. Despite the very large differences in the number of mailpieces measured between Quarters 2 and 4, in the annual aggregate calculation, these Quarter performance results are treated as nearly equal contributors to the annual percent on time score.
- a. Please specify the reasons for the large volume fluctuations between quarters, particularly for the Quarter 2 end-to-end number of mailpieces. Include the confidence interval range of score values for each quarter percent on time value shown in the table. For the annual percent on-time calculation, include the confidence interval range of values for the percent on time annual score. Identify the specific methodology in the annual score error/confidence interval calculation that would account for the large sample size (mailpieces) differences between quarters.
  - b. Explain why the particular choice of aggregation methodology does not factor or weight the calculations to include the actual number of mailpieces measured.
26. In the December 21, 2010, USPS filing titled “Quarterly Performance Reports for Quarter 4-FY2010”, there is an Excel file titled “Standard Mail Quarterly Scores.xls” that includes a worksheet titled “SM YTD”. The mail pieces delivered between October 1, 2009 to September 30, 2010 are shown by districts. The row entry (row 20) for the Kentuckiana end-to-end column (column D) is empty. The “SM Quarter” worksheet (in the same file) shows the end-to-end percent on time for Kentuckiana as 49.5%. Please update the “SM YTD” worksheet Kentuckiana row in the end-to-end percent on time cell to provide the annual percent on-time score or an explanation for why the cell for the Kentuckiana row is empty.

27. Please provide:

- a. the number of post office emergency suspensions in effect at the beginning of the reported fiscal year and the duration of each suspension (39 CFR 3055.91(a)(4));
- b. the number of post office emergency suspensions during FY 2010 (39 CFR 3055.91(a)(5));
- c. the status of each suspension in the Postal Service's decision-making process to either close or reopen; and
- d. the number of post office emergency suspensions in effect at the end of FY 2010 (39 CFR 3055.91(a)(6)).

By the Chairman.

Ruth Y. Goldway