

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

STAMP FULFILLMENT SERVICES
SERVICE PERFORMANCE MEASUREMENT

DOCKET NO. RM2011-14

COMMENTS/MOTION OF DAVID B. POPKIN

September 22, 2011

Respectfully submitted,

PRCrm201114COMMENTS

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On September 1, 2011, the Commission released Order No. 837 ["Order"] soliciting comments on the Postal Service's reporting requirements for the measurements of level of service afforded by the Postal Service in connection with Stamp Fulfillment Services ["SFS"].

As noted on page 3 of the Order, the Postal Service by letter dated July 29, 2011, informed the Commission of its intent to institute an internal measurement system for SFS and asked for Commission comment. The Postal Service proposed service standards, measurement methodologies, and reporting requirements and further indicated that it will formalize its proposed service standards through a *Federal Register* notice.

It is now a few days shy of two months since the Postal Service indicated that it will be placing a notice in the *Federal Register*. It has yet to appear in the *Federal Register* as of September 22, 2011. As noted in footnote 6 of the Order, WHAT the service standards are is not a topic of discussion with the Commission but only on HOW they are reported.

Without the details that will be contained in the *Federal Register* notice, the ability to comment is curtailed and I request that the Commission extend its deadline for comments until 20 days after the notice appears in the *Federal Register*.

It is noted on page 3 of the Order that the measurement will start when an order is entered into the National Consumer Management System ["NCMS"]. Without knowing the operation of the NCMS, it could potentially not count delays that occurred between the time that the order was physically received by the SFS and the time that the order was entered into the NCMS.

I have been a regular customer of the SFS for many years now by placing telephone orders with the 1-800-STAMP24 number and my perception is that orders are shipped within a few days. I placed an order on September 14, 2011, and this order was shipped on September 19, 2011, which would be the third business day after placing the order. The order was shipped by Priority Mail and received on September 21, 2011, which matches the two-day service standards for Kansas City to New Jersey.

Based on my observations of the Philatelic Orders over the past years would appear to indicate that the less than or equal to ten business days [two or more calendar weeks] would be met 99.99% of the time and therefore not provide any challenge to the Postal Service to improve the service or to provide meaningful reporting to the Commission. The Postal Service should be required to furnish data on the time taken to fulfill Philatelic Orders over the past few years so that the use of a ten day standard can be evaluated. I have made a FOIA request for this data but have no idea if it will be furnished and if so when it will be furnished.

It should also be noted that some orders may not be shipped until well after the normal shipping date in the case of an order containing, either partially or completely, items that have a future day of issue and therefore cannot be shipped until that day. In the case of a partial order of future items, it appears that the order will be shipped in two shipments

– one with the items that can be shipped and the other with all of the future items when all of the future items can be released.