

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

Stamp Fulfillment Services
Service Performance Measurement

Docket No. RM2011-14

**RESPONSE OF UNITED STATES POSTAL SERVICE TO COMMENTS/MOTION OF
DAVID B. POPKIN**
(September 28, 2011)

On September 22, 2011, David B. Popkin filed a document entitled, "Comments/Motion of David B. Popkin," pursuant to Commission Rule 21. Mr. Popkin states that the Postal Service sent a letter to the Postal Regulatory Commission (Commission) on July 29, 2011, advising of its intent to institute an internal measurement system for Stamp Fulfillment Services (SFS) and asked for Commission comment.¹ Mr. Popkin also notes that the Postal Service proposed service standards, measurement methodologies, and reporting requirements in its July 29, 2011, letter and further indicated that it will formalize its proposed service standards through a *Federal Register* notice, but has not published such notice to date. As a result, Mr. Popkin requested that the Commission extend its deadline for comments until 20 days after the notice appears in the *Federal Register* because the ability to comment is curtailed without the details that will be contained in the *Federal Register* notice.²

The Postal Service does not oppose the underlying basis of Mr. Popkin's request, and has attached (1) the letter dated July 29, 2011 from Kevin A. Calamoneri,

¹ Docket No. RM2011-14, Comments/Motion of David B. Popkin, September 22, 2011, at 1-2.

² *Id.*

Managing Counsel, Corporate & Postal Business Law, United States Postal Service to, Shoshana M. Grove, Secretary, Postal Regulatory Commission; (2) the letter dated August 25, 2011, from Shoshana M. Grove, Secretary, Postal Regulatory Commission, to Kevin A. Calamoneri, Managing Counsel, Corporate & Postal Business Law, United States Postal Service; (3) a description of the proposed service performance measurement plan for SFS; and (4) a copy of the proposed *Federal Register* notice in its final format to this response. The Notice will be filed with the Office of the Federal Register this week and should be made public within approximately a week after it is filed. However, in order to allow the Commission to stay as close as possible to the current schedule, the Postal Service requests that the deadline for comments be extended until 5 days after the filing of this response and that reply comments be due 10 days after this filing.

As information, the Commission did not provide comments on the Postal Service's proposed service standards, measurement methodologies, and reporting requirements until August 25, 2011. The Postal Service did not offer an exact date when it would publish the *Federal Register* notice, and it has only been a little over a month since it received the Commission's reply. Furthermore, Mr. Popkin states that "WHAT the service standards are is not a topic of discussion with the Commission but only on HOW they are reported."³ However, the Commission's Order No. 837, Notice of Proposed Rulemaking on Periodic Reporting of Service Performance Measurements for Stamp Fulfillment Services already describes both what the proposed service standards are and how they will be reported. The *Federal Register* notice and the proposed service performance measurement plan will provide little to no additional

³ *Id.* at 1.

information outside of what the Commission has already related. Accordingly, Mr. Popkin's request should be granted only to the extent that it extends the deadline for comments, but denied on the grounds that it should be extended until 20 days after the *Federal Register* notice is published.

In summary, the Postal Service respectfully requests that the deadline for comments be extended until 5 days after the filing of this response and that reply comments be due 10 days after this filing.

Respectfully submitted,

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