

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Periodic Reporting
(Proposal Ten)

Docket No. RM2015-3

PUBLIC REPRESENTATIVE MOTION
FOR ISSUANCE OF INFORMATION REQUEST

(November 7, 2014)

Pursuant to Rules 39 C.F.R. §3001.21(a) and 39 C.F.R. §3007.3(c), the Public Representative requests Commission issuance of an Information Request seeking clarification and additional information from the Postal Service concerning its proposal to incorporate new field study data into three parcel mail processing cost models and the Standard Mail Destination Entry cost model.¹ Responses to the questions posed below are intended to enhance understanding of Proposal Ten so as to allow participants to provide more constructive comments and evaluate whether the proposal meets applicable legal and regulatory requirements.

In its Petition, the Postal Service states that in the 2014 field study, “the productivity values for loading and unloading tasks were significantly higher than those measured in the 2009 study.” Petition, Proposal Ten at 5. The Postal Service observes that the higher productivity values are related to the timely loading and unloading of trucks. *Id.* In this regard,

¹ See Petition of the United States Postal Service for the Initiation of a Proceeding to Consider Proposed Changes in Analytical Principles (Proposal Ten), November 3, 2014.

postal vehicle drivers and highway contract drivers were both regularly observed assisting mail handlers with the loading and unloading of trucks during the 2014 study, but were not observed doing so during the 2009 study. The time drivers spent assisting mail handlers was not incorporated into the productivity estimates in the 2014 study because those costs are not defined as mail processing costs. *Id.*

Proposed Questions

1. Please explain what occurred between the 2009 study and 2014 study that caused postal vehicle drivers and highway contract drivers to regularly assist mail handlers with the loading and unloading of trucks, as observed during the 2014 study.
2. Please confirm that pursuant to a labor agreement or a highway transportation contract, postal vehicle drivers and highway contract drivers, respectively, are required to assist mail handlers with the loading and unloading of trucks at NDCs. If not confirmed, please explain what will cause drivers to continue to assist mail handlers with the loading and unloading of trucks.
3. In how many NDCs out of the total number of NDCs included in the 2014 field study did the Postal Service observe postal vehicle drivers and highway contract drivers regularly assisting mail handlers with the loading and unloading of trucks at NDCs? If the number of NDCs in which the Postal Service observed this behavior is less than the total number of NDCs in the 2014 field study, please explain.
4. What portion of the “significantly higher” productivity values for loading and unloading tasks in the 2014 field study is caused by postal vehicle drivers and

highway contract drivers regularly assisting mail handlers with the loading and unloading of trucks at NDCs? Please explain.

5. Please provide productivity values for loading and unloading tasks assuming that the time drivers spent assisting mail handlers is incorporated into the productivity estimates in the 2014 study.

Nina Yeh
Public Representative

901 New York Avenue, N.W., Suite 200
Washington, DC 20268-0001
Phone (202) 789-6811; Fax (202) 789-6891
Email: nina.yeh@prc.gov