

Before the  
POSTAL REGULATORY COMMISSION  
Washington, DC 20268-0001

Service Performance Measurement :  
Systems for Market-Dominant Products : Docket No. PI2015-1

MOTION OF THE GREETING CARD ASSOCIATION  
FOR ISSUANCE OF INFORMATION REQUEST

The Greeting Card Association (GCA) hereby respectfully moves that the Commission issue an Information Request to the Postal Service, to obtain clarification of an issue concerning Single-Piece First-Class Mail. The Service's proposal regarding Single-Piece substitutes an internal for an external measurement system, and thus requires Commission approval under 39 U.S.C. sec. 3691(b).

*Background.* The Postal Service's revised *Service Performance Measurement* plan, filed March 24, 2015, indicates that no data will be recorded for pieces left for pickup by carriers. Such pieces would include those left in a household's curbside mailbox or in an "Out" box on the front counter of a small business. The revised SPM report states that:

The proposed SPM system will measure mail entering Postal Service collection boxes and office building chutes (aka Postal Service collection points) and will monitor performance through delivery. There are three components of measurement: First Mile, Processing Duration and Last Mile. To measure First Mile and Last Mile Impact, Postal Service letter carriers will be instructed to scan barcoded mailpieces from randomly-selected collection points and delivery points. . . . [1]

This description implies that no record will be made of pieces entering the system otherwise than through collection boxes or mail chutes.<sup>2</sup>

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<sup>1</sup> Revised *Service Performance Measurement*, p. 18.

<sup>2</sup> We recognize that this is also a characteristic of the present EXFC system. The question seems worth raising, however, in the context of the intended general overhaul and improvement of the service performance measurement system.

*The need for an Information Request.* Single-Piece First-Class mail left for carrier pickup may be an important component of the category as a whole. In FY 2013, households sent 12.3 billion pieces of First-Class Mail.<sup>3</sup> It seems probable that a large fraction of this mail is left for carriers to pick up, particularly when one considers the secular decline in the number of street collection boxes. There are important differences between entry through carrier pickup and the entry channels the Service does plan to measure – for example, there is no pre-established cutoff time for carrier pickup entry, as there is for a street letter box, since the timing of the carrier’s visit to the customer’s mailbox or “Out” box may vary significantly from day to day. This suggests that if, as seems likely, mail left for carriers is a significant fraction of the Single-Piece total, some assessment of First Mile Impact on it should be part of the system.

GCA therefore suggests, first, a question along these lines:

**“Does the Postal Service have data, or an estimate satisfactory to it, of the number of Single-Piece First-Class Letters and Cards which enter the system through being left for pickup by carriers? If so, please provide it. If not, please identify any available data from which such an estimate could be made.”**

This information would allow the Commission, and interested parties, to assess the importance of the issue we have raised.

Establishing the relative significance of the fraction of Single-Piece mail is only a start, however. Assuming it is significant, as we believe it is, the evident next question is whether it can be included in the revised SPM system, and, if so, how. Here we suggest a question like the following:

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<sup>3</sup> U.S. Postal Service, *Household Diary Study, FY 2013*, Table I.5.

**“Has the Postal Service considered a means of measuring First Mile Impact on Single-Piece First-Class Letters and Cards left for carrier pickup? If so, please describe fully such consideration, and explain why such measurement was not made part of the proposed system.”**

GCA submits that (i) neither proposed question should impose on the Postal Service a significant burden (and certainly not a burden disproportionate to the importance of the issue), and (ii) the information sought by the proposed questions would materially assist the Commission in deciding whether, or on what terms, to permit the substitution of an internal for an external measurement system for Single-Piece First-Class letter mail.

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Respectfully submitted,

GREETING CARD ASSOCIATION

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