

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

Service Performance Measurement
Systems For Market Dominant Products

Docket No. PI2015-1

**MOTION BY AMERICAN POSTAL WORKERS UNION, AFL-CIO
FOR ISSUANCE OF INFORMATION REQUEST
(April 8, 2015)**

The American Postal Workers Union (APWU) respectfully moves the Commission to request the following information from the Postal Service, to obtain clarification of an issue concerning Single-Piece First Class Mail.

The Postal Service's revised Service Performance Measurement (SPM) plan, filed March 24, 2015, indicates that no data will be recorded for pieces left for pickup by employees. Such pieces would include mail 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 there will be no record made of pieces entering the system other than through a collection box or a mail chute.

By contrast, the External First-Class (EXFC) system measures test pieces from nearly all ZIP Codes across the country dropping mail off at certain collection points including (lobby chutes) as well as blue collection boxes until its delivery. The EXFC system further measures service performance for other types of mail, including commercial and international First-Class Mail.

At the March 18, 2015 technical conference, the Postal Service representative

stated the USPS belief that there will be at least one piece of mail in a collection box that has a bar code that can be scanned, according to a study done in 2012. The Postal Service plans to have the carrier or clerk scan the piece for a sample. The USPS did not provide any plan of how samplings would be selected and how many samplings would be scanned. The USPS had no software program as to how a random sampling would be selected. USPS stated IBM was still working on a software program for the USPS. To address the asserted need for this change, the Commission should request the following information from the Postal Service:

1. What measures has the Postal Service taken to review service measurement by other external independent third parties?
2. How much is the USPS paying for this sampling software program they have assigned IBM to provide for this internal SPM?
3. What studies have the USPS performed to ensure that any service measurement system will not be affected by the self-interest of USPS managers to report favorable results?
4. Are there financial incentives that will directly or indirectly bear on internal measurement by management (including pay and other incentives for high scores for a facility making service standards)?
5. At this time the new degraded service standards that went into effect on January 5, 2015 have not been met by most of the mail processing facilities across the country, including the losing and gaining facilities on the list for Consolidations or Closures. The EXFC scores show after 12 weeks that mail is being delayed. What guarantees does the USPS offer that an internal system would not be utilized to cover

up the extent to which service has been impaired?

6. How will the proposed SPM system identify errors and cover-ups by management (such as faulty scanning by managers, mail left sitting in trailers in the dock area that has not been scanned as arrived at the facility, and scanned mail as attempted delivery when in fact the mail had not left the post office) where management is in charge of the measurement system?

7. The USPS presentation did not provide a plan for how the public would have input and/or appeal rights as to system outcomes. If the Postal Service were to approve internal measurement of performance, how will the public be able to challenge the accuracy and integrity of the reports?

8. The USPS presentation on March 18, 2015 reported that carriers would be buzzed on their phone to scan mail for sampling prior to the delivery point. The presenter stated the GPS will tell the USPS where the delivery problems are. How does that advance notice of sampling assure random and objective testing?

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Respectfully submitted,

/s/ Michael T. Anderson

Michael T. Anderson
Rebecca Golubock Watson
Murphy Anderson PLLC
1701 K Street NW, Suite 210
Washington, DC 20006
(202) 223-2620
(202) 296-9600 (fax)

manderson@murphypllc.com
rwatson@murphypllc.com