

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

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Service Performance Measurement  
Systems For Market Dominant Products

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Docket No. PI2015-1

**MOTION BY AMERICAN POSTAL WORKERS UNION, AFL-CIO  
FOR ISSUANCE OF INFORMATION REQUEST**

The American Postal Workers Union (APWU) respectfully moves the Commission to request the following information from the Postal Service to obtain clarification concerning the USPS Statistical Design Plan for Internal Service Performance Measurement (Design Plan).

On October 28, 2015, the Postal Service held a PRC technical conference (October 28 Conference) on the Design Plan. Through the Design Plan, the Postal Service proposes to terminate some elements of its external performance measurement system and replace them with an internal system.

To address the asserted need for this change, the Commission should request the following information from the Postal Service:

1. The Design Plan states that the Postal Service would replace some existing external and hybrid service performance measurement systems. At the October 28 Conference, Postal Service representatives did not explain what external measurements would be abandoned in lieu of new internal measurements. Exactly what systems will be replaced?
2. The Design Plan frequently uses the term "Postal Service personnel" to describe individuals who would be involved in scanning samples and overseeing data

collection. Who exactly are “Postal Service personnel”? Who will make decisions as to when and where the samples will be taken? Who will combine the data?

3. At the October 28 Conference, Postal Service representatives stated that letter carriers and postal clerks would scan collection boxes, mail chutes, and also do last mile scans. Which postal clerks will be provided with scanners to take samples, and in what job capacity?

4. Postal Service representatives have spoken to letter carriers regarding the sample collection scanning process in the first week of October, and that since that time, carriers have been taking part in the sample collection scanning process. Does the Postal Service have statistics from this time period, and will they be made publicly available?

5. Will data collection technicians collect scans? If not, will this eliminate the bargaining unit Statistical Data Technician position?

6. At the October 28 Conference, Postal Service representatives stated that there are 151,000 collection boxes included in the software for target samplings. Will all 151,000 be selected for sampling in one year? How often will the same box be selected?

7. According to page 5 of the Design Plan, “First Mile performance data for the retail channel will be represented by non-sample single-piece mail inducted over the counter at retail locations with Special Services such as Certified Mail. These data will be combined with the Carrier Sampling and collection data to formulate the overall First Mile performance estimates.” Please list all the Special Services that will be included.

8. How are First Mile profiles developed? Will the same managed collection points sampled continue to be used for every sampling taken throughout the year?

9. According to pages 7 and 12 of the Design Plan, “PPS sampling will be used to select collection boxes.” How will PPS sampling be applied in order to determine which collection boxes are selected? Since there is no great volume found in collection boxes, will the Postal Service also have external performance measurements on flats?

10. On page 7 the Design Plan states, “[t]he operational requirements for collection box density tests call for such tests to be performed over a two week period at least one time per year.” Who will perform these tests? What is the process for determining which two weeks of the year will be selected for the test?

11. The Design Plan states that offices with only a few collection boxes will be excluded from the carrier sampling process. Page 12, note 7. Given that this could conceivably eliminate every post office that has only one collection box in front, does this mean that the collection scanning will be done on city collection routes only? If other types of routes like rural routes are included, what percentage of the samplings will be done at rural routes compared to city routes?

12. At the October 28 conference, Postal Service representatives did not explain how retail counters and mail chutes will be selected, and if all post offices nation-wide are listed in the software. Representatives mentioned that Hawaii, Guam, Puerto Rico, and Alaska would not be a part of the sampling locations selected. What post offices and what states are included in the selections listed in the software?

13. The Design Plan states that Special Services such as Certified Mail will be entered at retail entry. Given the rise in Priority Mail, does the Postal Service plan to utilize Priority Mail scans as well? If the Postal Service plans to measure Priority Mail scans, has the Postal Service taken the potential deterioration of Priority Mail barcodes under consideration?

14. The Design Plan establishes a process where sampling targets are distributed across a 3-digit zip code in proportion to volumes of mail. Please provide more detail about this process and an example of how it will be applied.

15. As the Postal Service consolidates many plants, mail scheduled to go to a gaining facility ends up going to another facility outside the district. How will the estimates take into this into account?

16. Why is the Postal Service only reporting on performance at the district 3-digit zip code level and not at the 5-digit zip code level? How will the sampling be sufficient to give a reliable picture of different sorts of economic, social, and geographic areas of delivery with only the 3-digit zip code level?

17. The Design Plan states, “[a]s a general rule, when Postal Service personnel approach delivery points randomly designated for sampling, the instruction will be to scan the barcodes on all of the mail being delivered on the sampling date, across all of the sampling groups.” Page 19. Does the letter carrier scan the barcodes of letters and flats at selected delivery points for a specific addressee, or does he or she scan all the mail in a tray for delivery in that neighborhood? When and where does the scan take place? Will the carrier be told to pull over to the side of the road to take this random scan or will the carrier take the scan at a particular address?

18. The Design Plan states that that a configurable maximum number of pieces will be scanned. Page 23. If there is no match with the original scanned piece, will the Postal Service then assume that piece was still delivered?

19. The Design Plan states that the sampling groups for First Mile and Last Mile estimation “are less granular than the required service performance reporting levels,” but that the sampling groups are reasonable because the Postal Service will make “certain assumptions about the independence between the legs.” Page 27. What does this mean?

20. The Design Plan states that the Postal Service cannot account for “non-sampling error.” Apparently, service performance estimates assume that the First Mile is the same for accountable and non-accountable pieces, and there is no way to evaluate the error that could result. Page 31. Why is there no method to evaluate the error that an assumption introduces?

21. At the October 28 conference, Postal Service representatives stated that the cost savings figures involved in the Design Plan were sent to the PRC. Have these figures been made public? If not, why not? What is the formula for estimating the cost savings, and what is included in the costs?

22. What effort was made by the Postal Service to analyze whether the External First-Class system could be improved and made less costly, rather than offering an internal process that apparently is based mostly on estimates?

23. Approximately 38% of the mail deposited is from the home mailbox. Does the Postal Service plan to measure that mail?

24. When will complaint tracking be placed into the measurement system through the Postal Service's nation-wide call centers data?

25. What measures has the Postal Service taken to address confidentiality of mail under study?

26. What measures has the Postal Service taken to prevent extraordinary measures managers may take to identify and process collection mail to the processing facility immediately?

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Respectfully submitted,  
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