

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Service Performance Measurement
Systems for Market Dominant Products

Docket No. PI2015-1

PUBLIC REPRESENTATIVE FOURTH MOTION
FOR ISSUANCE OF INFORMATION REQUEST

(September 2, 2016)

Pursuant to Rules 39 C.F.R. §3001.21(a) and 39 C.F.R. §3007.3(c), the Public Representative requests that an Information Request be issued to obtain clarification from the Postal Service concerning several aspects of the Postal Service Plan on Service Performance Measurement Systems for Market Dominant Products.¹ The proposed questions seek additional information necessary to allow the Commission and participants to evaluate whether the Service Performance Measurement Plan meets the applicable statutory requirements of 39 U.S.C. §3691.

Proposed Questions

For Questions from 1 through 2, please refer to USPS Library Reference 2.²

1. On page 1 of the Preface to USPS Library Reference 2, the Postal Service states that the library reference “also includes for each quarter a report summarizing observations on the operation of the system.” Please indicate the name(s) of the file(s) that contain such reports.

¹ USPS Service Performance Measurement (Revised March 24, 2015), March 24, 2015 (Postal Service Plan).

² USPS-LR-PI2015-1/2 – USPS Proposed Internal Service Performance Measurement System Data for Quarters 2 and 3 of Fiscal Year 2016, August 10, 2016 (USPS Library Reference 2).

2. On page 2 of the Preface to USPS Library Reference 2, the Postal Service states that in Quarter 2 of FY 2016, it started “to identify and correct Last Mile delivery issues.”
 - a. Please describe the Last Mile delivery issues and how the Postal Service is dealing with them?
 - b. Were all of the issues resolved by the end of Quarter 3 of FY 2016? If not, which issues remain unresolved, and when does the Postal Service expect to resolve them?

For Question 3, please refer to USPS Library Reference 2 and Statistical Design Plan.³

3. On page 1 of the Preface to USPS Library Reference 2, the Postal Service states that it was the seventh week when "sampling quantities started to meet desired targets for statistical representation." Did the Postal Service adjust the targets or make any other corrections to the proposed sampling methodology described in the Statistical Design Plan? Please explain in detail.

For questions from 4 through 6 please refer to USPS Library Reference 4⁴ and Statistical Design Plan.

4. On slides 20, 23, 28, 31 and 34 in USPS Library Reference 4, there is a description of lessons the Postal Service learned during implementation and testing of the internal service performance system in Quarters 2 and 3 of FY 2016.
 - a. Please indicate if and how the described lessons would affect the Statistical Design Plan.

³ Notice of the United States Postal Service Concerning the Filing of the Statistical Design Plan for Internal Service Performance Measurement, August 25, 2015 (Statistical Design Plan).

⁴ USPS-LR-PI2015-1/4 – USPS Proposed Internal Service Performance Measurement System: PowerPoint Slides Presented at August 26, 2016 Technical Conference, August 26, 2016 (USPS Library Reference 4).

- b. If the described lessons would require updates to the Statistical Design Plan, please indicate the estimated date when the Postal Service expects to incorporate such revisions and/or provide the updated statistical design plan to the Commission. If such date is not known, please explain why.
5. On slide 4 in USPS Library Reference 4, there is a presentation of the internal service performance measurement milestones. Some of these milestones are shown as already completed, while others are shown as upcoming.
 - a. Does the Postal Service expect to complete all milestones indicated on the slide by January 2017? If not, please explain.
 - b. Does the Postal Service anticipate any new challenges that it does not currently account for, but which could create additional milestones needed to complete? Please explain.
6. On slides 44 through 46 in USPS Library Reference 4, there are charts that compare the service performance scores under the current and the proposed service performance measurement systems for different products.
 - a. Please clarify the units of measurement for the differences between scores (e.g. percentage, number of days).
 - b. Please indicate if comparatively high differences between the old and new scores indicate problems with the proposed internal system. Using examples, please explain.

For questions 7 and 8, please refer to USPS Library Reference 2 and USPS Library Reference 4.

7. On page 1 of the Preface to USPS Library Reference 2, the Postal Service indicates that there are “substantive differences between Internal SPM and the current external measurement system” and “there is no expectation that the service scores can or will be identical for each product between the two systems.” Slide 39 in USPS Library Reference 4 lists the reasons for the potential

differences in service performance scores, as well as the Postal Service's goals of comparisons between scores.

- a. Does the Postal Service already have (or is it currently developing) any methodology that would allow effective comparison of the Postal Service scores between the current external system and the proposed internal system? Please provide the methodology for such comparison, if it is available. If it is not available, please indicate when it will be provided.
 - b. Please explain whether the Postal Service anticipates certain new service scores to be consistently above or consistently below the old service scores? Please explain the reasons for any consistent differences.
 - c. On slide 39 in the USPS Library Reference 4, there is a reference to the analysis that would explain "statistically significant differences" between the old (legacy), and the new (internal) service performance measurement systems. Please describe this analysis.
8. On page 2 of the Preface to USPS Library Reference 2 and on slide 39 in USPS Library Reference 4, the Postal Service states that both measurement systems (EXFC and the proposed internal system) are subject to sampling and non-sampling error.
- a. Is the Postal Service anticipating that the service performance scores under the proposed internal measurement system would provide more accurate measurements than the EXFC scores? Please explain why or why not.
 - b. Please describe the steps that the Postal Service is currently undertaking to minimize non-sampling error?
9. Will the presentation style of the periodic service performance reports under the proposed internal system remain exactly the same as it is under the current system? If not, what will be changed?

Respectfully submitted,

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