

Before the
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Service Standards and)
Performance Measurement)
For Market Dominant Products)

Docket No. PI2007-1

OFFICE OF THE CONSUMER ADVOCATE NOTICE OF REVISION
TO APPENDIX ATTACHED TO COMMENTS FILED
IN RESPONSE TO NOTICE OF REQUEST FOR COMMENTS
(July 31, 2007)

The Office of the Consumer Advocate (“OCA”) hereby files revisions to the Appendix attached to its July 16, 2007, response to the Postal Regulatory Commission’s June 13, 2007, “Request for Comments on Modern Service Standards and Performance Measurement for Market Dominant Products.” (Order No. 21)

OCA’s comments included an Appendix consisting of Tables 1, 2 and 3, that displayed the major mail classes, subclasses and rate categories, mail volumes and the proposed service performance measurement system in the short term or long term. As indicated in the comments, the tables are for the convenience of the Commission in order to illustrate, as we can best determine, the types of mail expected to be measured. Further review has indicated some corrections are necessary to clarify and correct the tables. The corrections are included in the Appendix, Revised 7-31-07, attached hereto.

Table 1 (First-Class Mail) is revised to show that in First-Class Mail, the planned (and existing) system of service performance measurement for parcels, both single-

piece parcels and Business Parcels, will continue to be scans of Delivery and Signature Confirmation barcodes. Table 1 is also revised to show that Presorted letters, flats and cards will rely on the Intelligent Mail Barcode (IMB), planned for implementation in 2009. Finally, for single-piece cards, the table is corrected to reflect the fact that Regular (single-piece) cards are, and will continue to be, measured using EXFC.

In Table 2 (Standard Mail), for Regular Nonautomation parcels and Nonautomation Nonprofit parcels, the planned system of service performance measurement is to be scans of Delivery and Signature Confirmation barcodes. Table 2 is further revised to show that all Regular Automation flats entered at a BMC/SCF will use IMB for performance measurement. Automation Nonprofit letters, and flats entered at a BMC/SCF, will also utilize the IMB for service performance measurement. For flats entered at the DDU, the planned system of measurement will consist of a combination of scans of IMBs and handling unit scans, such as flat tubs and bundles. Also, the reference to "NFM Pieces" is deleted. For ECR and Nonprofit ECR letters and flats, the planned system of service performance measurement is to be based upon scans of the largest handling unit, such as pallets, trays and tubs, while parcels will be measured using scans of Delivery and Signature Confirmation barcodes.

Table 3 (Package Services section) is revised by adding in the Unmeasured column for both short and long term, the words "w/out Delivery Confirmation" after "Non-machinables."

OCA respectfully submits the foregoing for the Commission's consideration.

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APPENDIX

Table 1

FIRST-CLASS MAIL

Revised: 7-31-07

SUBCLASS (Rate Category and/or Shape)	SERVICE STANDARD	MEASUREMENT SYSTEM			FY 2006			
		EXISTING SYSTEM	EXISTING SYSTEM	PLANNED SYSTEM	STATUS - ISSUES	VOLUME (000)	% OF TTL FC MAIL	% OF TTL DOMESTIC
Letters & Sealed Parcels								
Single-Piece	Overnight 95%,							
Letters	2-Day 93%,	EXFC	EXFC	Ongoing	42,067,621	43.1%	19.8%	
Flats	3-Day 90%;	EXFC	EXFC	Ongoing	37,428,415	38.3%	17.6%	
Parcels		Del/Sign Conf. Scans	Del/Sign Conf. Scans	Ongoing	3,405,121	3.5%	1.6%	
Nonmachinable Ltrs		None	(TBD)	Unknown	535,025	0.5%	0.3%	
BRM Ltrs		None	(TBD)	Unknown	384,607	0.4%	0.2%	
					314,453	0.3%	0.1%	
Presorted								
Letter		None	IMB	Planned 2009	1,735,392	1.8%	0.8%	
Flats		None	IMB	Planned 2009	1,525,444	1.6%	0.7%	
Nonmachinable Ltrs		None	(TBD)	Unknown	173,905	0.2%	0.1%	
					36,043	0.0%	0.0%	
Automation								
Letters		None	IMB	Planned 2009	48,121,440	49.3%	22.7%	
Flats		None	IMB	Planned 2009	47,301,360	48.5%	22.3%	
Business Parcels		Del/Sign Conf. Scans	Del/Sign Conf. Scans	Ongoing	820,080	0.8%	0.4%	
Subtotal					5,170	0.0%	0.0%	
					91,929,623	94.2%	43.3%	
Cards								
Regular (Single-Piece)		EXFC	EXFC	Ongoing	2,252,490	2.3%	1.1%	
Presorted		None	IMB	Planned 2009	369,194	0.4%	0.2%	
Automation		None	IMB	Planned 2009	3,017,377	3.1%	1.4%	
BRM Cards		None	(TBD)	Unknown	48,769	0.0%	0.0%	
Subtotal					5,687,830	5.8%	2.7%	
Total					97,617,453	100.0%	46.0%	

Source: RPW, FY2006. Nonmachinable Letters and QBRM Letters and Cards derived from Billing Determinants, FY2006.

Table 2

STANDARD MAIL

Revised: 7-31-07

SUBCLASS (Rate Category and/or Shape)	SERVICE STANDARD	MEASUREMENT SYSTEM			FY 2006		
		EXISTING SYSTEM	PLANNED		VOLUME (000)	% OF TTL STD MAIL	% OF TTL DOMESTIC
			SYSTEM	STATUS - ISSUES			
Regular							
Nonautomation	Origin Entered, 3-to-10 Days				2,915,026	2.8%	1.4%
Letters		None	(TBD)	Unknown	1,604,144	1.6%	0.8%
Flats		None	(TBD)	Unknown	758,153	0.7%	0.4%
Parcels		None	Del/Sign Conf. Scans	Unknown	552,729	0.5%	0.3%
NFM Pieces		None	(TBD)	Unknown	-	0.0%	0.0%
Automation				51,926,750	50.7%	24.5%	
Letter		None	IMB	Planned 2009	40,905,442	39.9%	19.3%
Flats					11,021,308	10.8%	5.2%
BMC/SCF		None	IMB	Planned 2009			
DDU		None	IMB + Handling Unit Scans	Unknown			
Subtotal					54,841,776	53.5%	25.8%
Nonautomation (Nonprofit)				1,656,678	1.6%	0.8%	
Letters		None	(TBD)	Unknown	1369795	1.3%	0.6%
Flats		None	(TBD)	Unknown	265,296	0.3%	0.1%
Parcels		None	Del/Sign Conf. Scans	Unknown	21,587	0.0%	0.0%
NFM Pieces		None	(TBD)	Unknown	-	0.0%	0.0%
Automation (Nonprofit)				10,309,841	10.1%	4.9%	
Letter		None	IMB	Planned 2009	8,530,470	8.3%	4.0%
Flats		None			1,779,371	1.7%	0.8%
BMC/SCF			IMB	Planned 2009			
DDU			IMB + Handling Unit Scans	Unknown			
Subtotal				11,966,519	11.7%	5.6%	
Regular Subtotal				66,808,295	65.2%	31.5%	
Enhanced Carrier Route							
ECR				33,015,016	32.2%	15.5%	
Letters		None	Handling Unit Scans	Unknown	8,450,362	8.2%	4.0%
Flats		None	Handling Unit Scans	Unknown	24,562,425	24.0%	11.6%
Parcels		None	Del/Sign Conf. Scans	Unknown	2,229	0.0%	0.0%
Nonprofit ECR				2,636,248	2.6%	1.2%	
Letters		None	Handling Unit Scans	Unknown	1,111,523	1.1%	0.5%
Flats		None	Handling Unit Scans	Unknown	1,524,647	1.5%	0.7%
Parcels		None	Del/Sign Conf. Scans	Unknown	78	0.0%	0.0%
Subtotal				35,651,264	34.8%	16.8%	
Total				102,459,559	100.0%	48.3%	

Source: RPW, FY2006.

Table 3

USPS Mail Measurement System for Periodicals and Package Services

Revised: 7-31-07

SUBCLASS/RATE CATEGORY (Rate Schedule)	SERVICE STANDARD	MEASUREMENT SYSTEM		MAIL PIECES		FY 2006		
	EXISTING	EXISTING	PLANNED	MEASURED	UNMEASURED	VOLUME (000)	% OF TOTAL DOMESTIC	
Periodicals	1 to 7 days	Confirm	Short Term			Mail pieces not tracked using Red Tag or Confirm Newspapers Non-machinable flats High density & saturation mailings DDU entry	9,022,563	4%
			Confirm Reg Tag until IMB in place	Flats with Confirm Red Tag Mail				
			Long Term					
			Confirm IMB pieces - 2009	Flats with Confirm IMB mail pieces	Non-machinable flats High density & saturation mailings DDU entry mail pieces Mail processed on an FSS that can not read an IMB			
Package Services Includes: Parcel Post Bound Printed Matter Media Mail Library Rate*	2 to 9 days	Delivery Confirmation	Short Term			Non-machinables w/out Delivery Confirmation Mail pieces w/out Delivery Confirmation	1,174,553	1%
			Delivery Confirmation	Mail pieces with Delivery Confirm.				
			Long Term					
			Delivery Confirmation IMB pieces - 2009	Mail pieces with Delivery Confirm. IMB mail pieces	Non-machinables w/out Delivery Confirmation DDU entry w/o Delivery Confirmation			

* USPS does not separately track Library and Media Mail or Bound Printed Matter in Package Services.

Note: IMB = Intelligent Mail Barcode