

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

SERVICE PERFORMANCE MEASUREMENT
SYSTEMS FOR MARKET DOMINANT PRODUCTS
(CONSOLIDATING DOCKET NOS. PI2025-2 AND RM2024-9)

Docket No. RM2024-9
Docket No. PI2025-2

COMMENTS OF THE NATIONAL POSTAL POLICY COUNCIL
(March 14, 2025)

The National Postal Policy Council respectfully submits these comments in response to Order No. 8728.¹

On February 28, 2025, the Postal Service submitted proposed revisions to its Service Performance Measurement (SPM) Plan that would implement changes being made pursuant to its Delivering for America Plan discussed in Docket No. N2024-1. The proposed changes are numerous; however, NPPC will address only the proposed changes in Critical Entry Times for First-Class Presort mail² and the proposed non-count of Sundays (or holidays) for mail entered on the preceding Saturday (or day before a holiday).

Regarding the proposed revised Critical Entry Times, NPPC notes that Postal Service testimony in Docket No. N2024-1 stated that “RTO will not impact Presort FCM,

¹ Notice and Order Regarding Consideration of Proposed Modifications to Service Performance Measurement Plan for Market Dominant products and Related Design Documents, Docket No. RM2024-9 and Docket No. PI2025-2 (Mar. 4, 2025) (“Notice and Order”).

² The Postal Service plans to adjust the CET for Presort First-Class Mail entered at an RPDC or within 50 miles of an RPDC from 20:00 to 18:00. Other CETs for mail entered at such locations will be adjusted based on that. For Presort First-Class Mail entered more than 50 miles from an RPDC, the Postal Service will also set earlier CETs. See *United States Postal Service Notice of Filing Changes to Service Performance Measurement Plan Document*, at 5-6 (Feb. 28, 2025).

though adjustments to CETs and/or entry locations for Presort FCM *may* be required.” USPS-T-1, Docket No. N2024-1, at 11 (Hagenstein) (emphasis added). The Postal Service offered no further elaboration in that docket, and NPPC urged the Postal Service “to consult closely with business mailers before proposing any changes to CETs.”³ NPPC regrets to say that it is unaware of any significant effort by the Postal Service to consult with presort mailers about these CETs changes. And, indeed, now that the Postal Service has announced the changes, NPPC members believe these CET changes are likely to have real world effects by slowing presort service from levels currently forecast by the Postal Service under the Regional Transportation Initiative. Given that likelihood, these CET changes warrant a re-estimation of impact, optimally in consultation with mailers, by the Postal Service before being imposed.⁴

In contrast, the non-count of Sundays/holidays as transit days for mail entered on the immediately preceding Saturday was the subject of considerable attention in Docket No. N2024-1. The Commission found that the change was a service standard change, noting that it “will result in expected delivery taking an extra day (or more) for substantial portions of Market Dominant mail” and that substantial portions of Market Dominant mail will experience service downgrades even beyond those presented by the Service’s testimony. *Advisory Opinion on the Operational and Service Standard Changes*

³ National Postal Policy Council Statement of Position, Docket No. N2024-1, at 7 (Dec. 18, 2024) (“NPPC Statement”).

⁴ The Postal Service apparently assumes that these CET changes are business rules that merely implement the service changes reviewed in Docket No. N2024-1. However, the Postal Service offered no details about these CET changes in that docket and has nowhere either quantified the volume of Presort mail potentially affected by these CETs changes or shown whether the changes will not generally affect service on a nationwide basis to such an extent warranting a separate case under Section 3661.

Related to the Delivering for America Plan, Docket No. N2024-1, at 232 & 243 (Jan. 31, 2025) (“*Advisory Op.*”).

Furthermore, the Commission noted that the Postal Service’s estimate of mail that would receive service upgrades or downgrades as a result of its changes did not include the effects of the non-count of Sundays.⁵ Consequently, by not counting Sundays (or the day before a holiday) even though the change adds at least one day to delivery for the affected mail, the Postal Service “will make service look better than it actually is.” *Advisory Op.* at 236 (*quoting NPPC Statement* at 14).⁶ More succinctly, the Commission found that the non-count of Sundays for Single-Piece First-Class Mail, such as remittance mail received by NPPC member businesses, would “misrepresent[] the reality.” *Id.* at 235.

In its *Notice and Order* in this proceeding (at 7), the Commission expressed particular interest in whether the proposed revisions are “sufficient to enable SPM to produce accurate, reliable, and representative results” for each 5-Digit to 5-Digit ZIP Code pair. NPPC submits that given the Commission’s findings in Docket No. N2024-1 that the proposed non-count of Sundays/holidays as transit days for certain mail could misrepresent actual service and constituted a service standard change of at least a day for affected mail, the answer must be no.

⁵ *Advisory Op.* at 236. The omission was due to the Postal Service’s position that the non-count was not a service standard change, a position that the Commission rejected. Indeed, the Commission observed that the Postal Service had treated a similar non-count a service change in its Load Leveling Plan and had not explained why it did not do so in Docket No. N2024-1. See *Advisory Op.* at 237, *citing United States Postal Service Request for an Advisory Opinion on Changes in the Nature of Postal Services*, Docket No. N2014-1, at 3 & 6-7 (Dec. 27, 2013).

⁶ Indeed, the Postal Service admitted in Docket No. N2024-1 that the non-count of Sundays/holidays mean that the affected mail “would potentially enter the network a day late.” Docket No. N2024-1, Response to Interrogatory MH/USPS-T2-3 (Owens).

Instead, as the Commission stated in its *Advisory Opinion*, “[i]f the Postal Service truly needs that Sunday for flexibility, it should instead announce that it is increasing the service standard for some mail.” *Id.* at 237, *quoting NPPC Statement* at 11. The Postal Service surely has the capability to track service performance against non-misleading service standards in a manner that results in clear and non-misleading service performance reports.

Accordingly, the National Postal Policy Council urges the Commission not to approve the proposed non-count of Sundays/holidays.

Respectfully submitted,

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