

1. Colorado/Wyoming – service in this district is impacted by COVID-19 and employee unavailability. Employees from other facilities are being moved to the processing plant to mitigate this problem, as needed. Overtime is being maximized. USPS also hired new employees. As discussed in Mr. Barber’s and Mr. Coleman’s testimony on October 31, 2020, and in the document titled, “Extraordinary Measures – Return Ballot Mail Processing Policy,” dated October 28, 2020, special, extraordinary measures to process and deliver ballots are now in place.
2. Central Pennsylvania – service in this district is impacted by COVID-19 and employee unavailability. Employees from other facilities are being moved to the processing plant to mitigate this problem, as needed. Overtime is being maximized. USPS has also hired new employees. As discussed in Mr. Barber’s and Mr. Coleman’s testimony on October 31, 2020, and in the document titled, “Extraordinary Measures – Return Ballot Mail Processing Policy,” dated October 28, 2020, special, extraordinary measures to process and deliver ballots are now in place.
3. Detroit – service in this district is impacted by COVID-19 and employee unavailability. Employees from other facilities are being moved to the processing plant to mitigate this problem, as needed. Overtime is being maximized. USPS has also hired new employees. As discussed in Mr. Barber’s and Mr. Coleman’s testimony on October 31, 2020, and in the document titled, “Extraordinary Measures – Return Ballot Mail Processing Policy,” dated October 28, 2020, special, extraordinary measures to process and deliver ballots are now in place.
4. Greater Michigan – service in this district is impacted by COVID-19 and employee unavailability. Employees from other facilities are being moved to the processing plant to mitigate this problem, as needed. Overtime is being maximized. USPS has also hired new employees. As discussed in Mr. Barber’s and Mr. Coleman’s testimony on October 31, 2020, and in the document titled, “Extraordinary Measures – Return Ballot Mail Processing Policy,” dated October 28, 2020, special, extraordinary measures to deliver ballots are now in place.

For those additional districts that had an inbound ballot processing score of either (i) less than 80 percent on November 5, 2020 or (ii) less than 90 percent on November 4, 2020 and November 5, 2020, Defendants again caution, as they have previously, that the daily reports are unreliable for a number of reasons.

First, as Defendants have explained, the daily processing scores do not include ballots that are turned around in local delivery units, which are delivered the same day with a near 100% success rate. In all processing plants, extraordinary

measures have been put into place, as set forth in the testimony and Extraordinary Measures memorandum referenced above. While the Postal Service's measurement system was approved by the Postal Regulatory Commission, and the service-performance data is accurate (and has been validated by third-party auditors) for purposes of quarterly reporting, the daily District data for ballots that are being reported pursuant to federal court orders do not provide a representatively accurate measurement of the Postal Service's service performance for Election Mail.

Second, as noted previously, only a subset of ballots is capable of being tracked (i.e., those identified by IMB or STIDs).

Third, many ballots are not captured by the Postal Service's measurement system, even if they could be tracked. The system tracks the performance of ballots within the operational network, and specifically the time between a mailpiece's first and last processing scan. As noted, because of the extraordinary measures that USPS has implemented, many delivery units have arranged for a "local turnaround" of ballots so that ballots are delivered locally, without ever entering the processing operation. Even for ballots that enter the processing operations, many receive a special sort to expedite delivery, and thereby do not receive a last processing scan that would allow them to be captured by the performance scores. In short, the scores are not representative because USPS' extraordinary measures, which expedite delivery, are resulting in ballots not being captured by its service-performance data.

Fourth, processing scores are calculated and measured when the last processing event is seen on the equipment and not against the date in which the mail was entered. As mail in the system tapers off and late pieces from prior higher volume days arrive at their destination, the processing scores are impacted, often negatively. Put another way, processing scores as a measurement for a particular mailing with volume that spikes and declines (as is typical for outbound and inbound ballots) is not representative of processing performance due to what the Postal Service refers to as the "tail of the mail." The score is measured when the mailpiece receives the last processing scan, so that as time moves on, the scores will decline towards zero as the only pieces remaining in the system are the failures. A more representative assessment of the processing score for ballots by District would consider all ballots measured for the duration of the election season.

Fifth, the volume of ballots measured on any particular day is often too small to be statistically significant. For example, if there are 5 ballots that fail to meet their standard, but 100 ballots total, the processing score will be significantly different than if there are 5 ballots that fail to meet their standard, but only 10 ballots in total. As the denominator decreases, as would be expected with ballots, the processing scores will continue to go down.

In summary, the daily data provided is unreliable for a number of reasons. Nonetheless, the Postal Service is in touch with the facilities identified above and others to ensure that extraordinary measures are being implemented to expeditiously move the mail.