



U.S. Department of Justice

United States Attorney  
Southern District of New York

86 Chambers Street, 3<sup>rd</sup> Floor  
New York, New York 10007

October 1, 2020

**VIA ECF**

Hon. Victor Marrero, United States District Judge  
United States District Court for the Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, New York 10007-1312

Re: *Jones et al. v. United States Postal Service et al.*, No. 20 Civ. 6516 (VM)

Dear Judge Marrero:

This Office represents the defendants in the above-referenced case. We write respectfully pursuant to the provision of the Court's September 25, 2020 Order, ECF No. 57, according to which the United States Postal Service ("USPS") is to "submit to the Court a list of steps necessary to restore First-Class Mail and Marketing Mail on-time delivery scores to the highest score each respective class of mail has received in 2020, which are 93.88 percent for First-Class Mail and 93.69 percent for Marketing Mail, and shall thereafter make a good faith effort to full implement the listed steps." *Id.* ¶ 4. Attached hereto as Exhibit A is the submission that USPS has provided to this Office, in compliance with this provision.

We thank the Court for its consideration of this matter.

Respectfully,

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1. Before addressing its list of steps, the Postal Service notes two important pieces of background information.
2. First, Postal Service on-time delivery scores are dynamic, and historically show variation. The Postal Service historically sees both downturns, and upticks, over periods of time. Of course, the Postal Service works toward upward trends, over longer periods of time. Nonetheless these scores historically show fluidity, which should be borne in mind when assessing the return to a specific historic score.
3. Second, the Order identifies First-Class Mail and Marketing Mail on-time delivery scores that the Postal Service reached in early 2020. Certain events outside of the Postal Service's control arose after this date, and these events may continue to impact on-time delivery scores. These events include: (i) the ongoing COVID-19 pandemic, which has continued to negatively impact service performance for a number of reasons including employee availability, as well as air transport operations (via flight changes and cancellations); and (ii) weather and other natural events, such as hurricanes and storms along the East and Gulf Coasts, and wildfires in the west.
4. In light of its commitment to restore scores to those identified in the Order, the Postal Service has identified several new or modified steps that focus on key tasks during each day's mail flow and that are designed to expedite the timely delivery of Election Mail and to improve on-time delivery of First-Class and Marketing Mail, without significant disruption to the nationwide flow of mail according to operating plans in place for over five years. The Postal Service is currently implementing the following:
  - a. Implementation of Dispatch of Value Minus 60 (DOV-60) during mail processing.

This refers to the time at which mail has been processed and is ready to be

dispatched, relative to the time that the trucks usually leave the facility. Under DOV-60, mail processing is complete no later than 60 minutes prior to the planned dispatch of a truck. This allows extra time to address unexpected issues during processing, while still dispatching the trucks on time so that they can timely arrive at the next destination. DOV-60 is intended to synchronize plant operations to the dispatch schedule to ensure good mail flow to delivery units. It does not restrict late or extra trips or restrict the window for mail processing for timely delivery of the mail.

- b. Improved Day Zero Processing for Marketing Mail. This expedites the first step of processing Marketing Mail. Customers drop off Marketing Mail in sacks/bundles/pallets. The first step to process the Marketing Mail is to unpack it, which is commonly referred to as “opening” the Marketing Mail. Under the Day Zero protocol, facilities open and process volumes earlier in the processing operation.
- c. Dissemination of “Processing to Plan” information to the field. This automatically transmits daily reports to Regional Vice Presidents, Division Directors, and processing Plant Managers. These reports flag small issues in processing, to allow local correction before deficiencies escalate. Examples of captured data include dips in the volume of mail processed, evaluated by product type, and compared to the volume that was planned to process. This also includes a report specifically for letters and flats that is released every six hours, to allow facilities to address potential issues even more quickly. These reports provide detailed processing data, by individual machines in the facility (including Delivery Bar Code Sorters,

Delivery Bar Code Sorter Input/Output Subsystems, Combined Input/Output Subsystems, and Automated Flats Sorting Machines). The data show the planned volume of mail to be processed, the actual volume of mail processed, and the types of operations (such as Delivery Point Sequence, and processing runs for letters, flats, and parcels). This allows facilities to pinpoint anomalies, or otherwise assess the effectiveness of its operations, down to the level of machine and specific operational step, and make adjustments as needed to facilitate timely mail delivery.

- d. Service Teams to troubleshoot problems. Where service failures occur, Service Teams can report to processing facilities so that the facilities can review and establish countermeasures. Service Team personnel may vary, but Service Teams work with representatives from local In-Plant Support, the Plant Manager, the Division Director, and Headquarters. Service Teams can troubleshoot issues such as mail- flow bottlenecks within the facility; staging and signage; getting the proper sequence of mail in and out of the facility; reviewing equipment quality and performance, and optimal machine operation. For example, a Service Team reviews a five-day period, from Saturday-Wednesday. The Team conducts entrance and exit meetings with the Division Director, Plant Manager, and members of Local In-Plant Support and Headquarters Operations. The Team reviews, among other items, service and delays; start and clearance times; operating plan compliance; proper color coding of mail (related to first-in, first-out sequence of mail); Run Plan Generator compliance to plan (referring to a software application to optimize machine usage and operational efficiency); and Cycle Time Reduction (referring to reducing time processes in the supply chain and the wait time between

processes). The Team also assigns action items to individuals, with due dates. HQ Processing Operations logs, and follows up on completion of, action items.

- e. Adjustments to operating windows on sortation machines to account for increased volume. The adjustments include increased staffing for locations and operations with expected high volumes, and early Sunday start times for all local operations.
- f. At Post Offices and delivery units across the country, efforts to improve and stabilize service are focused on ensuring units have adequate staffing to effect timely delivery of all mail. While this is still a challenge in some locations due to the ongoing pandemic, the Postal Service has targeted hiring efforts and shares resources across delivery units as necessary to address any staffing shortages. Retail and Delivery Operations is also focused on making sure that there are adequate resources and oversight of distribution operations in the mornings to ensure all committed mail and package volume is available for delivery as intended. Lastly, Retail and Delivery Operations is focused on improving collection and volume dispatch back to the processing centers.