Mailers Hub News

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In this issue …

USPS Orders New Delivery Vehicles, Including Electric Version. The first should arrive late next year. *Page 1.*

OIG White Paper Examines Electric Delivery Vehicles. The OIG report preceded the truck order by a week. *Page 2.*

USPS Plans to Change Service Standards for Parcels. The latest plan to improve service. *Page 3.*

OIG Examines STC Efficiency. The contractor-operated facilities aren't immune to problems. *Page 4.*

Commenters Weigh-in on PRC Data Requirements. Few people understand postal costing, but it's very important. *Page 5.*

USPS Seeks to Move More PO Boxes to Competitive Products. ZIPs near competitors are involved. *Page 6.*

February Financials: Higher Costs Surpass Higher Revenues. Revenues seem to never outpace persistent costs. *Page 6 & 7.*

Miscellany. Adjusting for reform; UPS fined; Amazon fined; Another union contract; Beats any LLV; Turkey trouble. *Page 8.*

All the Official Stuff. *Federal Register* notices, *Postal Bulletin* articles, *DMM Advisory* and *Industry Alert* postings. *Page 9.*

Calendar. Scheduled events and more. *Page 9.*

USPS Alerts and Notices Related to COVID-19. *Page 10.*

USPS Orders New Delivery Vehicles, Including Electric Version

In a March 24 press release, the Postal Service announced that it had placed an order for 50,000 Next Generation Delivery Vehicles with Oshkosh Defense, the contractor it had selected last year. The total cost of the order was stated to be $2.98 billion, or about $60,000 per vehicle, although that average may include costs other then the "sticker price" of each truck.

Electric vehicles

Of the number ordered, the agency stated that "a minimum" 10,019 vehicles would be electric-powered, with the remainder conventionally-powered. The release didn't comment on whether this apportionment was in reaction to recent criticism of the Postal Service's initial position that the total potential order would be only 10% electric. Nonetheless, in an included quote, the Postmaster General seemed keen to take credit for the greater number of electric vehicles:

> "Since I came on board a year and a half ago, we have continuously evaluated and adjusted our vehicle purchase strategy based on our future network initiatives, ongoing review of BEV application to our operational strategy, and our financial outlook ... . Based upon this work and our improving outlook, we have determined that increasing our initial electric vehicle purchase from 5,000 to 10,019 makes good sense from an operational and financial perspective. Many of our 190,000 delivery vehicles on the road are more than 30 years old and lack basic safety features which are standard in most vehicles today. ...
>
> "Today's order demonstrates, as we have said all along, that the Postal Service is fully committed to the inclusion of electric vehicles as a significant part of our delivery fleet even though the investment will cost more than an internal combustion engine vehicle. That said, as we have also stated repeatedly, we must make fiscally prudent decisions in the needed introduction of a new vehicle fleet. We will continue to look for opportunities to increase the electrification of our delivery fleet in a responsible manner, consistent with our operating strategy, the deployment of appropriate infrastructure, and our financial condition ... ."

At a Congressional hearing early in his tenure, the PMG had argued that the cost of the infrastructure necessary to support electric delivery trucks would add a significant amount to the cost of the vehicles themselves. In turn, he stated that if Congress wanted the USPS to buy electric trucks that additional financial assistance would be needed. Though politicians have been grousing recently about the Postal Service's original plan for only 10% electric vehicles, and though there's been discussion of appropriations to help electrify the postal fleet, nothing has been done to provide the funds.

Other matters

The USPS correctly noted that the NGDV is a significant upgrade from the decades-old long-life delivery vehicle that's the core of its current fleet:

> "... the NGDV will feature air conditioning, improved ergonomics, and some of the most advanced vehicle and safety technology – including 360-degree cameras, advanced braking and traction control, air bags, a front-and rear-collision avoidance system that includes visual, audio warning, and automatic braking. The vehicles will also have increased cargo capacity to maximize efficiency and better accommodate higher mail and package volumes."

The Postal Service stated that delivery of the NGDVs would begin "in late 2023" but did not elaborate on either when or where the first deliveries would be assigned or which delivery units would be equipped to operate electric trucks. Given contemporary technology and the assessment of most observers, electric trucks likely would be placed where daily milage would be relatively low.

OIG White Paper Examines Electric Delivery Vehicles

Though no-one disputes the need for the Postal Service to replace its aged fleet of Long Life Vehicles – some in their fourth decade of service – there's been considerable controversy over the agency's decision that most of its Next Generation Delivery Vehicles would be conventionally- rather than electrically-powered.

The most recent analysis of this situation was a white paper, *Electric Delivery Vehicles and the Postal Service*, issued March 17 by the Postal Service's Office of Inspector General. The OIG summarized its study:

"... The US Postal Service Office of Inspector General (OIG) sought to identify opportunities and challenges for the Postal Service in adopting electric delivery vehicles. In this white paper, we assessed the suitability of using electric vehicles as postal delivery vehicles. We analyzed the potential long-term cost savings of a new, electric delivery vehicle compared to a new, gas-powered vehicle. We also benchmarked the electric vehicle experiences of other federal agencies, foreign posts, and companies in the logistics and shipping sector.

"We identified several clear benefits of adopting electric vehicles into the postal delivery fleet, including improved sustainability and environmental impacts. Electric vehicles are generally more mechanically reliable than gas-powered vehicles and would require less maintenance. Energy costs will be lower for electric vehicles, as using electricity to power an electric vehicle is cheaper than using gasoline.

"Our research confirms that electric vehicle technology is generally capable of meeting the Postal Service's needs. Due to the diverse nature of postal delivery routes, however, there are multiple variables that could affect electric vehicle performance on specific routes. These factors include route length (as vehicles must return to a facility to recharge) and temperature (as batteries can suffer from reduced performance in extremely hot or cold climates).

"The adoption of electric delivery vehicles could save the Postal Service money in the long term – at least for certain delivery routes. The OIG commissioned a total cost of ownership model to project the relevant costs of owning and operating a vehicle over its planned lifespan. The upfront cost of buying a new electric delivery vehicle is significantly higher than the cost of buying a new gasoline-powered vehicle. Electric vehicles also require the installation of chargers and related electrical infrastructure, which further adds to the upfront costs. Once the vehicle is purchased and the charger installed, electric vehicles are generally cheaper to operate because energy and maintenance costs are lower. The Postal Service may wish to prioritize electric vehicle implementation where there is the highest likelihood that electric vehicles would achieve cost savings over gasoline-powered vehicles. For example, longer routes – up to 70 miles – are more suited to electric vehicles because the agency saves money on each mile driven compared to gas-powered vehicles.

"The Postal Service must make decisions about charging infrastructure that will influence the cost-effectiveness of implementing electric delivery vehicles at a given postal facility. Having a lower ratio of chargers to vehicles can cut down on upfront costs, but the agency must ensure that there are sufficient chargers available to meet a facility's needs. The type of charger is also important, as the cheapest variety of charger may be sufficient for vehicles that operate on shorter delivery routes and expend only a small portion of their battery's charge during the day.

"As the Postal Service rolls out an electric fleet, good planning and communication with stakeholders will help avoid and overcome potential implementation challenges. These include challenges in implementing charging infrastructure across a diverse array of postal facilities and the potential strain that a large number of electric vehicles could place on local electric grids.

"The upfront costs of vehicles and charging infrastructure are significant factors for the Postal Service as it determines the number of electric vehicles it will purchase in the future. External financial assistance would significantly change the cost-benefit analysis for the Postal Service. Congress is currently considering legislation that would help subsidize the purchase of electric vehicles and, in some areas, there will be incentives available to aid in the cost of installing charging infrastructure. ...

"Recently, on March 14, 2022, we received a congressional request to review the Postal Service's compliance with the National Environmental Policy Act (NEPA), among other issues, that are not addressed in this paper. The OIG will be doing additional work in response to that request."

Management disagreed

The OIG noted that, in response, USPS management disagreed, stating:

- "... the NGDV contract provisions had not been correctly reflected in the white paper.
- "... the OIG incorrectly represented electric battery usage.
- "... the impact of the drive cycle of delivery vehicles is not assessed within the OIG's Total Cost of Ownership (TCO) modeling analysis, nor was it considered in the assessment of long-term maintenance requirements.
- "... the OIG does not acknowledge the important impact of battery conditioning and the value of keeping vehicles connected to dedicated chargers to keep battery temperature in the optimal range.
- "... the $7,300 hardware cost figure used by the OIG reflected the installed hardware costs alone and did not include the make-ready costs for comparison to Postal Service costs.

USPS management also "requested incorporation of their response to the EPA letter where the OIG refers to and incorporates references to content from the EPA's letter."

In turn, the OIG replied:

- "... our description is accurate. The description reflects the Postal Service's own statements about the NGDV contract ...
- "[Regarding battery usage], the OIG obtained that information from a document produced by the Postal Service. Specifically, the Postal Service's Environmental Impact Statement ...
- "[Regarding that some delivery vehicles to not require daily charging], the Postal Service acknowledged this possibility in its Environmental Impact Statement ...
- "Regarding management's assertion that the OIG's white paper and TCO model does not fully account for the unique conditions of postal delivery vehicles' drive cycle, the OIG believes its white paper acknowledges those unique conditions and explains that other delivery providers' fleets experience different conditions.
- "[Regarding battery conditioning], the OIG emphasizes the white paper is intended to examine potential implementation considerations and inform discussion of these topics.
- "Regarding make-ready costs], it should be noted that make-ready costs for electrical work are included in the charger equipment and installation cost projections."

The OIG also noted that "the white paper's references to the EPA's letter to the Postal Service include a link to the same source (https://uspsngdveis.com/) that management cites in its comments letter."

USPS Plans to Change Service Standards for Parcels

In a March 21 filing with the Postal Regulatory Commission, the Postal Service sought an advisory opinion about its plan to align the service standards for First-Class Package Service with those for its Retail Ground and Parcel Select Ground competitive products.

After the *de rigueur* homage to the Postmaster General's 10-year Plan in the opening paragraphs, the agency moved on to present the substance of what it's planning to do.

"... For end-to-end package service within the contiguous United States, both [Retail Ground (RG)] and [Parcel Select Ground (PSG)] have a service standard ranging from 2 to 8 days. The Postal Service plans to upgrade that service standard to correspond with the 2- to 5-day service standard for First-Class Package Service (FCPS). This change would be enabled by simplifying the operational scheme for processing and transporting RG and PSG package volume within the contiguous United States by combining it with FCPS volume. The table below compares the current to the new service standards:

Standard	Current Rules (Contiguous US)	Planned Rules (Contiguous US)
2 day	If Origin and Destination Processing and Distribution Center (PDC) are the same facility, then Service Standard is 2 days.	Intra-SCF and Origin to Destination pairs where total transit time is up to 8-hrs* (~372 miles) from Origin to Destination ADC to Destination SCF.
3 day	If Origin and Destination Processing and Distribution Center (PDC) are not the same facility, then the package is routed through a Network Distribution Center (NDC) and an Auxiliary Service Facility (ASF), if needed. If Origin and Destination NDC are the same, and there is no ASF required, then Service Standard is 3 days.	Where the total transit time is greater than 8-hrs and up to 32-hrs* (~1,488 miles) from Origin PDC to Destination ADC to Destination SCF
4 day	If Origin and Destination NDC are the same, and there is an ASF required, then Service Standard is 4 days.	Where the total transit time is greater than 32-hrs and up to 50-hrs* (~2,325 miles) from Origin PDC to Destination ADC to Destination SCF.
5 day	If Origin and Destination NDC are not the same, determine the travel days between NDC facilities. If an ASF is not required, and the travel time between NDC facilities is 1 day or less, then the Service Standard is 5 days.	Where the total transit time is greater than 50-hrs from Origin PDC to Destination ADC to Destination SCF.
6-8 day	If Origin and Destination NDC are not the same, determine the travel days between NDC facilities within Service Standard Directory (SSD). If ASF is not required, then the Service Standard = travel time of 2 or more + 4. If ASF is required, then the Service Standard = travel time of 2 or more + 5.	N/A

"The planned RG and PSG service standards are predicated on the planned change to the FCPS service standards and the concomitant improvement and optimization of the Postal Service's package processing and surface transportation network and depends on consolidation with FCPS domestic surface volumes. ...

"Likewise, packages containing Hazardous Materials that are restricted from air transportation would not be included in the planned service standards because some RG and PSG packages may be routed by air transport where it is more cost effective to do so, and certain hazmat or live animals may not be suitable for this mode of transport. Hazardous Materials within the contiguous United States will, therefore, continue to be transported by ground in accordance with the current 2- to 8-day service standard. Live animals shipped by RG would also be excepted from the new service standards."

In explaining the reasons for the proposed changes, the Postal Service stated:

"... because RG and PSG are competitive products – i.e., products subject to private competition in the marketplace – the decision to change the applicable service standard is evaluated against the Postal Service's Board of Governors' exercise of their reasonable business judgment. ...

"The fundamental rationale for the planned change is to enhance service to customers sending larger packages. The opportunity to offer this enhanced service arose as a consequence of the planned change to the FCPS service standard and the concomitant improvement and optimization of the Postal Service's package processing and surface network. By consolidating RG and PSG volume with FCPS volume, the Postal Service can offer faster service for packages that exceed the weight and size limitations of FCPS.

"This will result in further improvement and rationalization of the Postal Service's portfolio of package products. The Postal Service submits that customers would benefit from for the provision of a low-cost, medium-speed, shipping service for packages in excess of one pound. The market for a faster, economical ground shipping product has seen significant recent growth and is expected to continue to grow as new shippers enter the market and business-to-customer shipments continue to increase.

"Shifting RG and PSG volume to follow FCPS volume would also enable the further optimization of the Postal Service's package processing and surface transportation networks. This added volume would fill existing unused capacity, maximizing surface transportation utility and value. In addition, by eliminating the current interim processing stops, the Postal Service can reduce the overall processing burden while at the same time improving speed and reliability by reducing touch points. And, by combining multiple sorts, the change would improve volume and capacity in surface lanes. ..."

The Postal Service stated that it

"... would not implement the service standard changes within the scope of this Request any sooner than 90 days after the filing of this Request."

Given that the USPS seldom waits longer than it must, the calendar shows that the 90-day period expires on Sunday, June 19. Whether the revised standards would be effective then will have to wait for a later announcement.

This is the third service standard change about which the agency has sought an advisory opinion from the PRC within eleven months. In each case, the agency filed the request because it was required to do so by statute and, in each case, given that the commission's opinion is only *advisory*, the Postal Service implemented its planned changes regardless of the PRC's advice.

The PRC docketed the filing as N2022-1 and, in a March 23 order, established the procedural schedule, concluding with the PRC's advisory opinion being issued by June 21.

OIG Examines STC Efficiency

As the Postal Service continues to increase its reliance on surface transportation to move mail over all but the longest distances, the performance of the thirteen surface transfer centers will be increasingly important.

Appropriately, on March 16, the Postal Service's Office of Inspector General issued an audit report, *Efficiency of Surface Transfer Centers in the Southern Region*, that summarized their examination of the facilities in Atlanta, Memphis, Orlando (Seminole STC), and Irving (TX) (Southern Area STC). As the OIG explained:

> "... The STC network consists of 13 contractor-operated facilities, with four facilities located in the Southern Region. Highway Contract Route (HCR) suppliers are primarily used to transport mail between STCs and other postal facilities. STCs use Postal Service systems to print labels and placards, perform scans on containers to track their movement within the network, and record transportation information.
>
> "Postal Service management oversees STCs' daily operations and manages supplier performance. Specifically, the Postal Service monitors the following key performance indicators when evaluating STCs: Trailer Utilization, Scan Compliance, Trips Departing On-Time, and Transportation Cycle Time. We used [Surface Visibility (SV)]scan data from fiscal years (FY) 2019 through 2021 to review these transportation metrics at the four Southern Region STCs.
>
> "From FY 2019 through 2021, the Postal Service's STC network handled about 48 million containers of mail. The Southern Region STCs handled about 19 million (or 40%) of these containers. Additionally, Southern Region STCs represent approximately 33% of the STC transportation network with an expansive geographical reach, connecting approximately 150 mail processing facilities."

Findings

The OIG stated that

> "Overall, Southern Region STCs improved their effectiveness by increasing trailer utilization over the last three years. However, it took longer for employees at each STC to unload trailers than it did three years ago. ..."

- **"Finding 1: Mail Preparation.** During our site observations, we found mail arriving at the STCs without proper labels or Mail Transport Equipment Labeler (MTEL) placards, including mail containing inaccurate transportation routing information and mailers who were not separating mail by transportation mode.

  "We observed mail with incorrect labels arriving at each STC. For example, placards on containers correctly destined for the Southern Area STC had labels incorrectly indicating the mail was for Sacramento. ...

  "We also observed containers arriving without placards and containing mixed mail types and destinations at the Seminole STC. ... Additionally, Postal Service facilities sent mail not planned for the surface network to STCs. For example, at the Seminole STC we observed mail arriving with incorrect placards indicating periodicals for the surface network; however, it contained live animals which should have been transported on the air network.

  "We also found that the Transportation Optimization Planning and Scheduling system contained missing or inaccurate transportation routing information at the Southern Area, Memphis, and Seminole STCs. ...

  "Mail arrived at STCs from originating mail processing facilities with improper labels or MTEL placards. This occurred because employees were not following the MTEL policy on the proper use of labeling and placards to ensure mail is dispatched with the correct routing information. ...

  "During our observations at the Southern Area STC, we found that mailers were not separating mail by air and surface transportation modes. Specifically, mailers were mixing air and surface mail in the same container, requiring additional processing. ...
- **"Finding 2: Highway Contract Route Driver Screening.** We found that HCR drivers did not always have proper identification verifying that they completed required security screening. During our site visits, we reviewed 141 outbound trips and observed 45 instances (32%) of drivers departing STCs without the required identification. ... Administrative Officials (AO) are responsible for obtaining screening information from HCR suppliers for all personnel who transport mail for the Postal Service. ...

  "Furthermore, STC personnel were not accurately recording driver information in SV. Specifically, of the 42,002 outbound trips from Southern Region STCs from July to September 2021, 24,830 (or 59%) were recorded in SV with incomplete or missing driver information.
- "**Finding 3: Highway Contract Route Management.** We found that HCR trips did not always operate according to the planned transportation schedule or were omitted by the supplier. ... In FY 2021, the number of omitted trips increased significantly."

Recommendations

The OIG offered four recommendations to management:

- "... reinforce the Mail Transport Equipment Labeler policy to ensure mail is dispatched with correct routing information.
- "... reinforce the requirements to ensure that transportation routing information is current, accurate, and complete, in transportation systems.
- "... reinforce the responsibility of Surface Transfer Center Coordinators to notify management responsible for Customer Supplier Agreements when mailers do not comply with their agreed upon mail separations.
- "... develop and implement periodic reviews to ensure Administrative Officials follow and enforce the security screening policy and issuance of identification badges for all Highway Contract Route personnel.
- "... reiterate through formal communication to Surface Transfer Center personnel the requirement for accurately recording driver information in Surface Visibility and using the irregularity reporting process to notify Administrative Officials when Highway Contract Route drivers do not have Postal Service-issued identification or badges."

The OIG noted that

> "Management generally agreed with the findings and agreed with recommendations 1, 2, and 4; but disagreed with recommendations 3 and 5. ...
>
> "Regarding recommendation 3, management stated that mailers may prepare their mail in accordance with either their CSA or as defined in the Domestic Mail Manual. Management further stated that there is no action required of an STC regarding a CSA, as the STC is a transfer hub where the requirement is to move volume timely. Management added that if an STC does not service specific destinations it will route the mail to a local plant for final processing and if an entire trailer load of mailer volume arrives incorrectly to an STC, the STC would notify others in the management chain to work with the mailer directly."

The OIG added that

> "... management's comments regarding mail preparation policies are accurate; however, their statement regarding routing mail to a local plant for final processing if the STC does not process it does not represent what we observed during fieldwork."

Commenters Weigh-in on PRC Data Requirements

Last October 8, the Postal Regulatory Commission initiated a rulemaking (RM2022-1)

> "... to consider possible improvements to the quality, accuracy, or completeness of data provided by the Postal Service in its annual compliance reports.
>
> "... [T]he Commission will once again develop an inventory of data collection and analysis needs, comprehensively evaluate these needs, and devise a plan for meeting these needs, with input from mailers, the interested public, the Postal Service and Commission staff."

Comments

Comments were due by March 25, and those that were submitted illustrated a range of views; for example:

- **Postcom:** "... First and foremost, we believe that any changes contemplated must reflect a coherent strategy to employ existing systems to improve accuracy in costing and efficiency in pricing.

  "... The Postal Service's existing systems collect voluminous data on volumes, revenues, costs, and performance. While longer-term efforts to add additional capabilities may eventually be warranted, the immediate focus of Commission and Postal Service efforts should be directed toward ensuring that existing systems, and the information collected therefrom, are being used optimally. ... For example, the Postal Service's systems are designed to produce average cost estimates that are accurate at a product level when measured annually. As a result, they may accurately measure aggregate changes over time, but will not reflect seasonal or geographic variation in product costs that might enable more efficient approaches to pricing such as node-based rates or peak-load pricing. ...

  "PostCom further contends that direct measurement of product costs in this way would enable the Postal Service to more readily understand the impact that operational changes would have on product costs, a problem that has plagued Postal Service efforts to control flats costs over time. ...

  "In related analysis, the Commission should examine the relationship between Postal Service costs and inflation. The Postal Service and the Commission have long hinted at a disconnect between Postal Service cost changes and economy-wide cost changes as measured by CPI-U, with the Commission blaming prior periods of low inflation or deflation for the Postal Service's inability to raise rates and recover its cost increases. ... To ensure Postal Service pricing authority does not exceed reasonable levels, the Commission should develop methods of evaluating the influence of economy-wide inflationary pressures on Postal Service costs."

- **USPS:** "... Since the initial strategic rulemaking docket, significant progress has been made in the Postal Service's capability to harness and summarize large amounts of operational data that are captured passively as part of the regular postal activities performed to accept, process, transport, and deliver the mail. For costing purposes, these advancements have enabled the Postal Service to more often use operational data that are passively collected, rather than continue to rely on expensive field collection efforts in its cost models. ...

  "There are three primary reasons, apart from reduced expenses, for the preference of operational data compared with special field data collection efforts. One, field data collection efforts typically furnish fewer data points to perform econometric or other analyses to estimate the appropriate volume variabilities. Two, operational data are beneficial because they are necessarily dynamic, in the sense of capturing contemporaneous information that reflects the current processing, transportation, and delivery environments. As such, the cost models that are contingent on the operational data either update automatically, or can easily be modified to use the most recent set of operational data, allowing the cost model to continue to reflect the current operating environment. Three, and most importantly, the Postal Service believes that operational data are, typically, a superior data source when compared with information captured through special field collection efforts. ...

  "The preference for the Postal Service to use operational data is not a novel idea, and the use of operational data in the regulatory cost models presented to the Commission has significantly increased since the previous strategic rulemaking docket. ..."

- **National Postal Policy Council:** "... NPPC respectfully suggests that a desirable area of research would be the effects of nominal (not inflation-adjusted) price changes on postal demand. Currently, the Postal Service's demand models are specified using "real" – that is, inflation adjusted – prices. ...

  "There is a disconnect between the use of "real" prices in these models and how businesses operate. Businesses do not set budgets or conduct business in real terms. Nor, for that matter, does the Postal Service. Neither private businesses nor the Postal Service report annual results using inflation-adjusted dollars. The Postal Service's financials do not deflate its revenue by inflation; instead, they present year-to-year comparisons in the nominal dollars, unadjusted for inflation, in which it was collected.

  "With regard to mailers' responses to postal rates, private businesses such as NPPC members use actual (nominal) prices in their planning and budgeting. ... An assumption that an increase in postal prices results in an equal increase in a business's mailing budget would run contrary to the experience of many NPPC members. Instead, higher postage rates mean that mailers simply cannot and do not mail the same volumes of mail at the same rate categories as they did previously. This could easily result in less mail than might be forecast by demand models that rely on inflation-adjusted postal prices. ..."

- **The PRC's "Public Representative":** "... the Postal Service should update outdated inputs in its worksharing cost avoidance models. For example, the last time the Postal Service updated density values in the Manual Density Table, the Postal Service relied on a study done in 2010. ... Nonetheless, as more than a decade has passed since that study, the Public Representative recommends that the Postal Service repeat the 2010 study to capture operational and mail characteristic changes that have taken place since then."

Translation

Most people outside the small community involved in determining postal costs may not be aware of the discipline's existence, and even fewer may understand the econometrics, statistics, and cost modeling involved.

Nonetheless, the arcane (and seldom visible) inner workings of postal costing are critically important to commercial mail producers and their clients, simply because the results of that activity are the primary bases for ratesetting. If postal costs are not measured and attributed accurately, prices for a category of mail, or the value of a worksharing discount, may be skewed accordingly.

A running argument parallel to the issue of finding and using the right data is how costs are attributed, especially for competitive products. This has inspired tenacious engagement by UPS and Amazon, among others, who view it less as an exercise in statistical purity than as an opportunity to advantageously influence USPS rates.

USPS Seeks to Move More PO Boxes to Competitive Products

In a March 16 filing with the Postal Regulatory Commission, the Postal Service requested approval to reclassify the post office boxes in hundreds of additional ZIP Codes from the market-dominant to competitive product category.

In flings made in 2010 and 2011, the USPS had requested to

> "... transfer Post Office Box service at a small number of locations from the market dominant product list to the competitive product list based on whether Postal Service customers had sufficient access to private mailbox service providers. The Commission approved these transfers in Order Nos. 473 and 870. Approximately 6,800 locations were transferred to the competitive product list, constituting approximately one-fifth of all Post Office Box service locations. ..."

At that time, the Postal Service noted that it was

> "... conducting further evaluations of all Post Office Box locations and might in the future seek the transfer of additional locations, if warranted, as it develops its understanding of the mailbox service market."

Since then, in filings in 2013, 2014, and 2021, the Postal Service received approval to transfer additional locations, representing over 1,850 more ZIP Codes. In its most recent filing, the agency stated:

> "Recently, the Postal Service has reevaluated the criteria that indicate competitive status and, based on that reevaluation, now seeks to transfer an additional 297 locations to a competitive Post Office Box fee group. The Postal Service's current request to transfer 297 Post Office Box service locations builds upon the existing five-mile criterion, extending it to eight miles. Consistent with nationwide suburban and ex-urban growth trends over the last decade and corresponding expansion into those areas by USPS competitors, the Postal Service requests that the Commission update the criteria applied to competitor locations an additional three miles to a range of eight miles. The attached Statement of Supporting Justification details the market research the Postal Service recently conducted that shows customers are willing to travel longer distances for PO Box service than the current five-mile criterion recognizes. Given that there is a total of approximately 32,788 locations offering Post Office Box service currently, the 297 locations encompassed by this Request represent a very small proportion of total locations."

The PRC docketed the filing as MC2022-46 and, in an order issued March 18, set April 29 and May 13 as the deadlines for comments and reply comments, respectively.

If approved, the result would be that PO boxes in about 27% of all ZIP Codes would be on the competitive product list.

February Financials: Higher Costs Surpass Higher Revenues

Many of the Postal Service's February revenue and volume figures were in welcome *black* ink, but sharply higher employee costs overwhelmed the bottom line with *red* ink. Market-dominant mail beat last February for both volume and revenue, with revenue helped by higher prices. Meanwhile, competitive product volume was stagnant, with revenue likely helped by the shipments of COVID test kits. Transportation costs were modestly higher, but the favorable workers' comp liability shrank by about 90%. Overall, the agency lost $306 million in February, $529 million less than planned, but $349 million more than February 2021. For FY 2022 to date, the net loss is $1.972 billion, $999 million less than planned, but $2.024 billion more than at the end of February 2021.

Volume and revenue

Total market-dominant mail volume for the month was up 7.5% from February 2021. First-Class mail was 3.0% higher, while Marketing Mail was 11.8% better, and Periodicals was up 4.0%; only Marketing Mail was higher for the year-to-date. Meanwhile, competitive products volume barely grew, up only 0.1% for the month (like helped by test kit shipments) but still down 7.2% for the YTD. Total USPS volume was 10.018 billion pieces, up 7.0% from last February, while YTD volume, 55.743 billion pieces, remained 1.1% lower.

- First-Class Mail: 4.089 bln pcs, +3.0%; 21.993 bln pcs, -2.1% YTD.
- Marketing Mail: 5.072 bln pcs, +11.8%; 28.906 bln pcs, +0.9% YTD.
- Periodicals: 257.7 mln pcs, +4.0%; 1.443 bln pcs, -6.1% YTD.
- Total Mkt Dom: 9.478 bln pcs, +7.5%; 52.682 bln pcs, -0.6% YTD.
- Total Competitive: 513.1 mln pcs, +0.1%; 2.893 bln pcs, -7.2% YTD.
- Total USPS: 10.018 bln pcs, +7.0%; 55.743 bln pcs, -1.1%.

As noted, market-dominant revenue was helped last August's price increase. Compared to SPLY, revenue from the market-dominant classes was up 14.7% for the month and 7.4% YTD, while revenue from the competitive products was up 9.0% for February (again, helped by test kit shipments) but down 2.8% for the YTD, all compared to SPLY. Total USPS revenue for the month ($6.363 billion) was 11.1% higher than SPLY and up 2.2% for SPLY YTD:

- First-Class Mail: $1.977 bln, +8.3%; $10.704 bln, +4.1% YTD.
- Marketing Mail: $1.201 bln, +19.4%; $6.881 bln, +10.9% YTD.
- Periodicals: $72.9 mln, +13.5%; $403.4 mln, +3.0% YTD.
- Total Mkt Dominant: $3.661 bln, +14.7%; $19.589 bln, +7.4% YTD.
- Total Competitive: $2.575 bln, +9.0%; $13.896 bln, -2.8% YTD.
- Total USPS: $6.363 bln, +11.1%; $34.310 bln, +2.2% YTD.

Expenses and workhours

Total "controllable" compensation and benefit costs ($4.712 billion) were 3.4% over plan for February and 5.0% higher than SPLY. Total expenses for the month ($6.673 billion) were 1.7% over plan and 17.3% higher than SPLY.

Workhour usage was 3.0% higher than plan for the month and 2.3% higher than SPLY, led by mail processing workhours that were over plan and higher than SPLY for YTD. Total workhours YTD are 0.1% below plan by 1.2% below SPLY.

- Month's end complement: 652,766 employees (507,292 career, 145,474 non-career) **+0.76%** compared to last February (647,813 employees: 491,948 career, 155,865 non-career), but **3.11% more** *career* workers than a year ago.

Compared to early-pandemic February 2020, USPS volume is down 9.7% (market dominant volume 10.7% lower; competitive product volume up 25.17%). Meanwhile, workhours are up 8.27% and "controllable" compensation and benefits are 6.92% higher. Those figures again repeat the worrisome trends of more employees and higher costs, but lower volume. *All the numbers are on the next page.*

USPS Preliminary Information (Unaudited) – January 2022 [1]

OPERATING DATA OVERVIEW [1,2]	Current Period					Year-to-Date				
Revenue/Volume/Workhours (Millions)	**Actual**	**Plan**	**SPLY**	**% Plan Var**	**% SPLY Var**	**Actual**	**Plan**	**SPLY**	**% Plan Var**	**% SPLY Var**
Revenue										
Operating Revenue	$6,363	$5,725	$5,728	11.1%	11.1%	$34,310	$33,518	$33,559	2.4%	2.2%
Other Revenue	$2	$1	--	100.0%	NMF	$12	$5	$3	140.0%	NMF
Total Revenue	$6,365	$5,726	$5,728	11.2%	11.1%	$34,322	$33,523	$33,562	2.4%	2.3%
Operating Expenses										
Personnel Compensation and Benefits	$4,994	$4,914	$4,113	1.6%	21.4%	$27,331	$27,618	$25,111	-1.0%	8.8%
Transportation	$743	$755	$719	-1.6%	3.3%	$4,399	$4,294	$4,128	2.4%	6.6%
Supplies and Services	$272	$269	$250	1.1%	8.8%	$1,315	$1,435	$1,293	-8.4%	1.7%
Other Expenses	$652	$614	$593	6.2%	9.9%	$3,201	$3,095	$2,925	3.4%	9.4%
Total Operating Expenses	$6,661	$6,552	$5,675	1.7%	17.4%	$36,246	$36,442	$33,457	-0.5%	8.3%
Net Operating Income/Loss	-$296	-$826	$53			-$1,924	-$2,919	$105		
Interest Income	$2	$3	$2	-33.3%	0.0%	$15	$13	$13	15.4%	15.4%
Interest Expense	$12	$12	$12	0.0%	0.0%	$63	$65	$66	-3.1%	-4.5%
Net Income/Loss	-$306	-$835	$43			-$1,972	-$2,971	$52		
Mail Volume										
Total Market Dominant Products [3]	9,478	8,633	8,814	9.8%	7.5%	52,682	50,429	53,017	4.5%	-0.6%
Total Competitive Products [3]	513	464	513	10.6%	0.0%	2,893	2,861	3,117	1.1%	-7.2%
Total International Products	27	32	34	-15.5%	-20.6%	168	180	202	-6.7%	-16.8%
Total Mail Volume	10,018	9,129	9,361	9.7%	7.0%	55,743	53,470	56,336	4.3%	-1.1%
Total Workhours	91	89	89	2.2%	2.2%	500	500	506	0.0%	-1.2%
Total Career Employees	**507,292**		491,948		**3.1%**					
Total Non-Career Employees	**145,474**		155,865		**-6.7%**					

MAIL VOLUME and REVENUE [1,2,4]	Current period			Year-to-Date		
Pieces and Dollars (Thousands)	**Actual**	**SPLY**	**% SPLY Var**	**Actual**	**SPLY**	**% SPLY Var**
First Class (excl. all parcels and Int'l.)						
Volume	4,089,418	3,970,140	3.0%	21,993,077	22,472,611	-2.1%
Revenue	$1,976,938	$1,825,960	8.3%	$10,704,463	$10,281,950	4.1%
Periodicals						
Volume	257,732	247,780	4.0%	1,443,063	1,537,588	-6.1%
Revenue	$72,936	$64,237	13.5%	$403,441	$391,614	3.0%
Marketing Mail (excl. all parcels and Int'l.)						
Volume	5,071,668	4,537,224	11.8%	28,906,034	28,646,355	0.9%
Revenue	$1,200,548	$1,005,582	19.4%	$6,880,645	$6,202,593	10.9%
Package Svcs. (ex. Inb'd. Intl Surf. PP @ UPU rates)						
Volume	36,838	36,373	1.3%	218,332	227,206	-3.9%
Revenue	$65,636	$61,457	6.8%	$375,296	$360,355	4.1%
All other Market Dominant Mail						
Volume	22,004	22,516	-2.3%	121,704	133,635	-8.9%
Revenue	$345,011	$233,488	47.8%	$1,224,919	$1,009,740	21.3%
Total Market Dominant Products *(ex. all Int'l.)*						
Volume	9,477,660	8,814,033	7.5%	52,682,210	53,017,395	-0.6%
Revenue	$3,661,069	$3,190,725	14.7%	$19,588,764	$18,246,253	7.4%
Shipping and Package Services						
Volume	513,075	512,432	0.1%	2,892,907	3,116,983	-7.2%
Revenue	$2,464,693	$2,263,075	8.9%	$13,398,881	$13,936,140	-3.9%
All other Competitive Products						
Volume	-	-	0.0%	-	-	0.0%
Revenue	$110,423	$100,002	10.4%	$497,134	$354,357	40.3%
Total Competitive Products *(ex. all Int'l.)*						
Volume	513,075	512,432	0.1%	2,892,907	3,116,983	-7.2%
Revenue	$2,575,116	$2,363,077	9.0%	$13,896,015	$14,290,497	-2.8%
Total International [5]						
Volume	27,103	34,381	-21.2%	168,374	201,546	-16.5%
Revenue	$127,023	$173,837	-26.9%	$824,800	$1,022,261	-19.3%
Total						
Volume [4]	**10,017,838**	9,360,846	**7.0%**	**55,743,491**	56,335,924	**-1.1%**
Revenue	**$6,363,208**	$5,727,639	**11.1%**	**$34,309,579**	$33,559,011	**2.2%**

EXPENSES OVERVIEW [1,2]	Current Period					Year-to-Date				
Dollars (Millions)	**Actual**	**Plan**	**SPLY**	**% Plan Var**	**% SPLY Var**	**Actual**	**Plan**	**SPLY**	**% Plan Var**	**% SPLY Var**
Controllable Pers. Comp. & Benefits [6,7]	$4,712	$4,559	$4,486	3.4%	5.0%	$25,837	$25,843	$25,210	0.0%	2.5%
RHB Unfunded Liabilities Amortization [8]	$83	$83	$75	0.0%	10.7%	$417	$417	$375	0.0%	11.2%
FERS Unfunded Liabilities Amortization [8]	$117	$117	$112	0.0%	4.5%	$584	$584	$560	0.0%	4.3%
CSRS Unfunded Liabilities Amortization [8]	$155	$155	$151	0.0%	2.6%	$774	$774	$757	0.0%	2.2%
Workers' Compensation [9]	-$73	$ --	-$711	NMF	-89.7%	-$281	$ --	-$1,791	NMF	-84.3%
Total Pers. Comp. & Benefits	$4,994	$4,914	$4,113	1.6%	21.4%	$27,331	$27,618	$25,111	-1.0%	8.8%
Total Non-Personnel Expenses	$1,667	$1,638	$1,562	1.8%	6.7%	$8,915	$8,824	$8,346	1.0%	6.8%
Total Expenses (incl. interest)	**$6,673**	$6,564	$5,687	**1.7%**	**17.3%**	**$36,309**	$36,507	$33,523	**-0.5%**	**8.3%**

WORKHOURS [1,2,3]	Current Period					Year-to-Date				
Workhours (Thousands)	**Actual**	**Plan**	**SPLY**	**% Plan Var**	**% SPLY Var**	**Actual**	**Plan**	**SPLY**	**% Plan Var**	**% SPLY Var**
City Delivery	32,648	32,328	32,262	1.0%	1.2%	179,794	180,942	182,982	-0.6%	-1.7%
Mail Processing	17,343	14,843	15,579	16.8%	11.3%	96,220	89,723	92,913	7.2%	3.6%
Customer Services & Retail	11,671	11,531	11,823	1.2%	-1.3%	64,433	65,749	67,573	-2.0%	-4.6%
Rural Delivery	17,022	16,659	16,559	2.2%	2.8%	93,018	92,432	93,135	0.6%	-0.1%
Other	12,526	13,176	12,893	-4.9%	-2.8%	66,387	71,268	69,202	-6.8%	-4.1%
Total Workhours	**91,210**	88,537	89,116	**3.0%**	**2.3%**	**499,852**	500,114	505,805	**-0.1%**	**-1.2%**

[1]/February 2022 had the same number of delivery days and retail days compared to February 2021. YTD has the same number of delivery days and 1.5 more retail days compared to SPLY. [2]/Numbers may not add due to rounding and/or adjustments. Percentages calculated using unrounded numbers. [3]/Excludes all International. [4]/The sampling portion of the RPW system is designed to be statistically valid on a quarterly and annual basis. [5]/Includes Current Period Market Dominant Volume of 14,162 and Revenue of $18,276; SPLY Market Dominant Volume of 16,879 (-16.1%) and Revenue of $21,949 (-16.7%). Also includes Current Period Competitive Volume of 12,941 and Revenue of $108,747; SPLY Competitive Volume of 17,502 (-26.1%) and Revenue of $151,888 (-28.4%). [6]/This amount includes cash outlays including administrative fees. [7]/This represents the accrual for normal RHB costs for current employees, based on the beginning of the fiscal year estimates. [8]/This represents the estimated OPM amortization expense related to the FERS and CSRS; the actual invoices will be received between June 2022 and October 2022. For PSRHBF, this represents the estimated Retiree Health Benefits amortization expenses of the unfunded liabilities. The actual invoice will be received between June 2022 and October 2022.. [9]/This represents non-cash adjustments: the impact of discount and inflation rate changes and the actuarial revaluation of new and existing cases. NMF = Not Meaningful Figure, percentages +/- 200% or greater.

Miscellany

Adjusting for reform

The passage of the Postal Reform Act of 2022 reduced, but did not eliminate, the Postal Service's obligations for future retiree costs. Given that the Postal Regulatory Commission had adopted a change to the ratesetting process in 2020 to generate funds for retirement costs, the amount that would be sought in the next rate case had to be adjusted as a result of the law.

In a March 14 letter to the PRC, the Postal Service stated:

> "With respect to retirement-based rate authority specifically, we calculated that the Postal Service is entitled to 1.071% of authority. This amount comprised compensation for our amortization obligations to the RHBF, the Civil Service Retirement System (CSRS), and the Federal Employee Retirement System (FERS). As indicated in the attached Excel spreadsheet, we calculate that canceling the RHBF obligation reduces the retirement-based rate authority for 2022 from 1.071% to 0.785%."

Shaving 0.286% off the next price increase isn't exactly the scale of relief postal ratepayers need, but any reduction is welcome.

UPS fined

According to a March 21 release by the US Department of Justice, United Parcel Service has "agreed to pay approximately $5.3 million to resolve its potential liability under the False Claims Act for falsely reporting information about the transfer of US mail to foreign posts or other intended recipients under contracts with the US Postal Service." As explained in the release:

> "USPS contracted with UPS to pick up US mail at six locations in the United States and at various Department of Defense and State Department locations abroad, and then deliver that mail to numerous international and domestic destinations. To obtain payment under the contracts, UPS was required to submit electronic scans to USPS reporting the time the mail was delivered at the identified destinations. The contracts specified penalties for mail that was delivered late or to the wrong location. The settlement resolves allegations that scans submitted by UPS falsely reported the time and fact that it transferred possession of the mail."

The statement noted that this is the "fifth civil settlement involving air carrier liability for false delivery scans under the USPS International Commercial Air Contracts, and collectively the United States has recovered more than $70 million as a result of its investigation of such misconduct."

Amazon fined

Amazon has been fined $250,000 to resolve accusations that the company shipped sodium azide through the mail, according to a March 22 news release by the US Attorney for the District of Utah.

If mixed with water, the substance can produce a potentially deadly toxic gas, and so is included on the USPS list of nonmailable substances. Sending it through the mail is a violation of federal law.

Amazon was accused of shipping the substance at least 196 times between January 2017 and December 2021.

Another union contract

As reported March 18 on the Postal Service's *Link*, the members of the National Rural Letter Carriers' Association have ratified a new three-year labor agreement that will be in force through May 20, 2024. The NRLCA represents over 132,000 rural carrier craft employees.

Though the union's website noted that the ratification vote was 72% in favor, it didn't publish other details of the terms of the new contract, but the USPS stated that

> "Highlights of the agreement include annual general wage increases, semiannual cost-of-living adjustments, measures designed to stabilize work schedules, increased flexibility to use rural carrier associates, and an interim process to expedite implementation of the revised standards from the Rural Route Evaluated Compensation System study."

Based on that summary, the contract appears to have features – and cost increases for ratepayers – similar to those of other recently established agreements between the Postal Service and its labor unions.

Beats any LLV

As reported by *CarScoops*, the Postal Service has auctioned off a 2018 Bentley Bentayga, a super-premium ride with just over 17,000 miles on it. Seized by the Postal Inspection Service as part of a civil forfeiture, the car is powered by a 12-cylinder, 6.0 liter engine delivering 600-horsepower – a little more than your average LLV, but with better gas mileage. Bids began at $25,000 but had already climbed to $107,500 as of March 17; the bidding closed last Thursday.

Turkey trouble

The traditional bane of letter carriers has been the dog, so many carriers keep pepper spray at the ready. (Many carriers also keep biscuits for the friendlier pooches.)

In the Arden-Arcade area of Sacramento (CA), however, the problem isn't dogs – it's wild turkeys. As reported by the Los Angeles *Times*, wild turkeys have been a problem since last October, leaving residents alone but going after postal carriers, as well as UPS, FedEx, and other delivery persons. One report noted four of the fowl going after a single carrier.

Delivery personnel usually use pepper spray or swing their mailbags to fend off attacks, but one carrier defended himself with a stick and ended up killing an attacking bird; wildlife officials commented that, at 25 pounds, it was "the biggest turkey I've ever seen." The bird's size, and the aggressiveness of the turkeys generally, was attributed not to the breeding season but to local residents who feed them "copious quantities of food," which is illegal in California.

As one wildlife official observed, "I walked up to the turkeys myself, and they didn't want anything to do with me. But when that mail carrier pulled up, they immediately went on the offensive."

All the Official Stuff

Federal Register

Postal Service

NOTICES

March 15: Record of Decision: Next Generation Delivery Vehicles Acquisitions, 14588-14589.

March 17: Privacy Act; System of Records, 15275-15277.

March 22: Meetings; Sunshine Act, 16262; Transfer of Post Office Box Service in Selected Locations to the Competitive Product List, 16255-16261.

March 23: Product Change: Priority Mail Negotiated Service Agreement, 16502.

PROPOSED RULES

March 24: Parcels Prepared in Soft Packaging, 16700-16702; Periodicals Requester Records Requirements, 16702-16703.

FINAL RULES

[None].

Postal Regulatory Commission

NOTICES

March 23: Mail Classification Schedule, 16501-16502.

March 28: New Postal Products, 17345-17346.

PROPOSED RULES

[None].

FINAL RULES

[None].

DMM Advisory

March 21: UPDATE 231: International Mail Service Updates Related to COVID-19.

March 22: Monthly Labeling List Changes.

March 22: UPDATE 232: International Mail Service Updates Related to COVID-19.

Postal Bulletin (PB 22594, March 24)

- Effective **July 10**, DMM 253, 255, and 705 are revised to clarify the use of Labeling List L051 for Parcel Select nonmachinable parcels and Parcel Select Lightweight (PSLW) irregular parcels. The Postal Service is expanding the use of Labeling List L051 to include all Parcel Select and PSLW parcels with destination sectional center facility (DSCF) prices. Specifically, in addition to machinable parcels, the Postal Service will require Parcel Select nonmachinable and PSLW irregular parcels to be entered at the DSCF under Labeling List L051 for DSCF prices. The Postal Service will also update *Quick Service Guide* 250 to include these revisions. Although these revisions will not be published in the DMM until July 10, 2022, the standards are effective April 3, 2022.
- Effective **March 24**, IMM Chapter 5 and the Individual Country Listing for Ukraine are revised to update information regarding US government sanctions on exports to the Crimea, Donetsk, and Luhansk regions of Ukraine, as well as any other regions that the Secretary of the Treasury designates as “covered regions” under Executive Order No. 14065.
- Effective **June 26**, IMM Exhibits 292.45a and 293.45a are revised to update the foreign office of exchange codes for International Priority Airmail (IPA) and International Priority Surface Air Lift (ISAL) items sent to Honduras.
- Effective **March 24**, Publication 431, *Post Office Box Service and Caller Service Fee Groups*, is revised to include the changes noted.

USPS Industry Alerts

March 18, 2022

2022 National Postal Forum Catalog

The 2022 National Postal Forum (NPF) Catalog is available for download now in digital format. You can access it HERE. The catalog outlines the NPF schedule of events and educational offerings taking place May 15 – 18, 2022 at the Phoenix Convention Center. Included in the catalog are an overview of the Postmaster General’s Keynote Address, the Executive Leadership team and Postal Officer sessions, and the five workshop tracks with all workshops listed. You will find information on two certification courses being offered this year – Executive Mail Center Manager and Mail Design Professional. The NPF Exhibit Hall will feature over 100 booths, a consultation area, and the Mailing Industry Resource Pavilion. We have many networking events to choose from including Peer-to-Peer, the Welcome Reception, Postal Customer Council Reception, Exhibitor’s Reception, and the Closing Event. NPF is the premier shipping and mailing conference of the year. To find out more details about NPF, refer to the catalog and share with colleagues. The catalog also provides information on how to register for NPF, or you can visit NPF’s website: NPF. If you need assistance with discount codes, please send an email to: NPFFeedback@usps.gov.

March 23, 2022

Reminder: Central Area AIM Virtual Meeting

You are cordially invited to attend the Central AIM Virtual Meeting on Tuesday, March 29, 2022, at 10:00 a.m. (CST). We have great speakers scheduled, featuring: Eric Henry, Vice President, Area Retail and Delivery Operations; Garrett Hoyt, Vice President, Technology Applications; Fontell Peart, Director, Operations Integration Support; Lindsey Taylor, Director, Industry Engagement and Outreach. Click here to register and join.

Calendar

To register for any webinar, go to MailersHubWebinars.com

March 29 – Central Area AIM Meeting

April 5-6 – MTAC Meeting, USPS Headquarters

April 11-14 – INg Executive Networking Forum, Tucson (AZ)

April 14 – Atlantic Area AIM Meeting

April 19 – ***Mailers Hub Webinar***

May 15-18 – National Postal Forum, Phoenix (AZ)

May 24 – ***Mailers Hub Webinar***

June 12-16 – In-Plant Printing & Mailing Ass’n Conf., Buffalo (NY)

June 21 – ***Mailers Hub Webinar***

July 12-13 – Delivery Technology Advocacy Council mtg., Sussex (WI)

July 19 – Atlantic Area AIM Meeting

July 19 – ***Mailers Hub Webinar***

July 26-27 – MTAC Meeting, USPS Headquarters

August 4-6 – MFSA Conference, Dallas (TX)

August 16 – Southern Area AIM Meeting

August 24 – Central Area AIM Meeting

October 20 – Atlantic Area AIM Meeting

October 25-26 – MTAC Meeting, USPS Headquarters

Special Section: DMM Advisories and USPS Industry Alerts Related to COVID-19

These service disruptions affect Priority Mail Express International (PMEI), Priority Mail International (PMI), First-Class Mail International (FCMI), First-Class Package International Service (FCPIS), International Priority Airmail (IPA), International Surface Air Lift (ISAL), and M-Bag items. Unless otherwise noted, service suspensions to a particular country do not affect delivery of military and diplomatic mail.

March 21, 2022, *DMM Advisory*: UPDATE 231: International Mail Service Updates Related to COVID-19

On March 21, 2022, the Postal Service received a notification from Jamaica Post, the designated operator of **Jamaica**, advising that the Government of Jamaica has lifted the national curfew as of March 18, 2022. The previously declared force majeure no longer applies and normal postal operations have resumed.

March 22, 2022, *DMM Advisory*: UPDATE 232: International Mail Service Updates Related to COVID-19

On March 22, 2022, the Postal Service received a notification from Latvijas Pasts, the designated operator of **Latvia**, advising that the increase in COVID-19 cases among staff members has ended. As a result, postal operations have returned to normal.

Thanks to Our Supporting Partners

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