



November 7, 2008

VICE PRESIDENTS, AREA OPERATIONS

SUBJECT: Audit Report – Revenue Generation by Automated Postal Centers  
(Report Number MS-AR-09-003)

This report presents the results of our self-initiated audit of Automated Postal Centers® (APC) (Project Number 08RG023MS000). Our objective was to determine whether the Postal Service is using best practices with its currently deployed APCs. Specifically, we identified: (1) the Postal Service districts that collected the highest percentage of eligible revenue<sup>1</sup> at APCs; (2) the Postal Service districts that collected the lowest percentage of eligible revenue at APCs; and (3) best practices used by the high-performing districts. This audit addresses strategic and operational risks.<sup>2</sup> See [Appendix A](#) for additional information about this audit.

### Conclusion

Postal Service officials have developed and implemented a variety of best practices regarding APCs. These include:

- Active oversight at the area level.
- Active, daily management at the district and local levels.
- Incentives to promote the use of APCs.
- Extended hours of access to APCs.
- Optimized hours of access to the retail window to meet customers' needs.

However, these best practices were not implemented equally effectively in all Postal Service districts. We estimate that effectively implementing best practices in the 10 districts that collected the lowest percentage of APC eligible revenue would result in approximately \$1.67 million in funds put to better use<sup>3</sup> during the next 2 years. See [Appendix C](#) for our calculation of the monetary impact.

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<sup>1</sup> Eligible revenue is the entire amount of revenue that could have been collected at the APC. It includes revenue collected at the APC as well as the retail window.

<sup>2</sup> The strategic risk is that of potential revenue loss due to electronic diversion. The operational risks involve possible process inefficiencies due to excess workhours; customer service issues associated with access to products and services; and slow migration to a more automated environment.

<sup>3</sup> Funds put to better use are funds that could be used more efficiently by taking the actions recommended.

The U.S. Postal Service Office of Inspector General (OIG) and district and retail unit officials raised several other matters that, while not directly related to our objective, could influence APC use:

- Adding foreign language instructions.
- Using digital signage.
- Adding barcode scanners to APCs.
- Balancing the emphasis between the Mystery Shopper program and APCs.

See [Appendix B](#) for our detailed analysis of this topic.

We recommend that the Vice Presidents, Area Operations:

1. Establish and maintain oversight of the Automated Postal Centers at the area level.

We recommend that the Vice Presidents, Area Operations, direct district managers to:

2. Manage Automated Postal Center usage proactively on a daily basis at the district level, via steps that include:
  - Using reporting tools.
  - Communicating regularly with field offices.
  - Visiting field offices periodically.
3. Conduct active, daily Automated Postal Center management at the local level, via steps that include:
  - Using reporting tools.
  - Ensuring that centers are well stocked, performing preventive maintenance, and ordering necessary replacement parts immediately.
  - Clearing alerts immediately.
  - Having supplies in a convenient, nearby location.
  - Using a proactive host.
  - Informing window clerks of the value and importance of these Automated Postal Centers for increased customer service.

We suggest that the Vice Presidents, Area Operations, consider:

4. Offering incentives to station managers, postmasters, and hosts for making outstanding use of Automated Postal Centers.
5. Offering incentives to customers for using Automated Postal Centers.
6. Providing 24-hour access to Automated Postal Centers in all locations.
7. Optimizing hours of access to the retail window by opening later or closing earlier.

## Management's Comments

Management agreed with our three recommendations and area officials stated that they had processes in place to ensure officials follow the recommendations. Additionally, Northeast Area officials stated they would establish an APC visit schedule and develop standard operating procedures incorporating best practices for APC sites by November 7, 2008. Southwest Area officials stated they would reissue APC instructions by November 4, 2008; Great Lakes Area officials stated they would complete APC refresher training with each district by October 31, 2008; and New York Metro Area officials stated they would conduct additional training on APC reports on November 2, 2008. However, Western Area officials stated that APC hosts were currently not financially feasible.

Management generally agreed with our four suggestions and stated they had processes either in place or in progress to ensure officials follow the suggestions. However, Southeast Area officials disagreed with our suggestion to offer incentives to station managers, postmasters, and hosts for making outstanding use of APCs because they said it is already management's responsibility to provide the best possible service to customers. They also disagreed with our suggestion to offer incentives to customers for using APCs because APCs provide benefits that make additional incentives unnecessary. New York Metro Area officials also disagreed with these suggestions, noting that they used both types of incentives when APCs were installed, but the incentives were no longer necessary.

Western Area officials stated they would consider the suggestion to offer incentives to station managers, postmasters, and hosts who make outstanding use of APCs when it is "practical" to do so. They also agreed with the suggestion to offer incentives to customers for using APCs if headquarters endorsed the plan and suggested that offering Click-N-Ship® rates at the APC would be a significant incentive for use to customers.

Eastern Area officials stated they would consider our suggestions to offer incentives to customers for using APCs and to optimize hours of access to the retail window by opening later or closing earlier.

Southwest and Pacific Area officials did not respond to our suggestions, and Great Lakes Area officials did not respond to our suggestions to offer incentives to station managers, postmasters, and hosts for making outstanding use of APCs and to offer incentives to customers for using APCs.

Northeast and Eastern Area officials agreed with the monetary impact we reported. However, Great Lakes Area officials stated that eligible revenue was overstated because it included transactions paid by cash or check. Western Area officials said they could not support our methodology for calculating the monetary impact for the same reason, but are "strongly committed" to capturing workhour savings. Pacific Area

officials stated that, although they agreed there is a potential for workhour savings, they did not agree with the monetary impact we reported. They noted the Honolulu District's highest performing APCs were meeting their revenue goals and should have been omitted from the calculation, resulting in a 37 percent reduction in monetary impact for the area. Pacific Area officials also stated that eligible revenue was overstated. Capital Metro Area officials did not respond to the monetary impact we reported. See [Appendix E](#) for management's comments in their entirety.

### **Evaluation of Management's Comments**

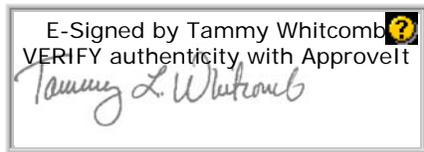
The OIG considers management's comments responsive to all the recommendations and suggestions, and management's corrective actions should resolve the issues identified in the report.

The OIG considers recommendations 1, 2, and 3 significant, and therefore requires OIG concurrence before closure. Consequently, the OIG requests written confirmation when corrective actions are completed. These recommendations should not be closed in the follow-up tracking system until the OIG provides written confirmation the recommendations can be closed.

Although Great Lakes and Western Area officials questioned our methodology for calculating monetary impact, they did not dispute the figures reported or present an alternative. The officials indicated that cash and check transactions should be excluded from our calculation because APCs do not accept cash or checks. Although APCs do not accept cash or checks, the reports management uses to evaluate whether APCs are achieving established goals include these transactions. We believe our methodology for calculating monetary impact is conservative because we used the national average of 20 percent of eligible transactions as a target for computing monetary impact rather than the significantly higher expected average for APCs.

Pacific Area officials also disagreed with our methodology, claiming the monetary impact we reported for the area is overstated by 37 percent because some APCs are meeting revenue goals. However, we believe our methodology was reasonable because Postal Service management defined what constitutes eligible revenue and our monetary impact calculations are based on a percentage of eligible revenue, not actual revenue collected. Even those APCs that are meeting revenue goals can improve if officials implement best practices. Therefore, we will report \$1,674,953 in funds put to better use in our *Semiannual Report to Congress*.

We appreciate the cooperation and courtesies provided by your staff during the audit. If you have any questions or need additional information, please contact Robert Mitchell, Director, Sales and Service, or me at (703) 248-2100.



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## APPENDIX A: ADDITIONAL INFORMATION

### BACKGROUND



In 2004 the Postal Service introduced the APC, a self-service kiosk designed to offer customers a wide range of postal products, services, and information.<sup>4</sup> The APC is a convenient alternative to counter services, enabling customers who do not require assistance to save time by avoiding the retail line. It also allows window clerks to focus on transactions that require face-to-face interaction. APCs are typically located in post office lobbies, and many are accessible 24 hours a day, 7 days a week. Presently 2,500 APCs are in use at post offices around the country.

Since APCs provide a self-service alternative to the window clerk, they further the Postal Service's goals of reducing costs and improving customer service. They are an important component of Retail Operations' goal of moving 40 percent of revenue to alternate access channels by 2010. Currently, 45 percent of all customer visits at retail counters can be completed in their entirety at the APC. However, APCs are diverting only about 20 percent of eligible transactions from retail counters nationally.

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<sup>4</sup> Using a touch screen and personal identification number (PIN) pad, customers can weigh and rate letters, flats, and parcels up to 70 pounds; purchase postage in any denomination for Express, Priority, First Class, International (under 1 pound), and Parcel Post mail. Customers can also print Express Mail forms; look up ZIP Codes; purchase Delivery Confirmation, Signature Confirmation, Insurance, Certified, and Return Receipt services; pay with debit, credit, and Electronic Benefit Transfer cards; and generate payment receipts.

The Retail Data Mart (RDM) contains standard time factors for various retail transactions, including those that can be completed at the APC. The Postal Service calculates total transaction times for retail units by applying the standard time factors to the actual transactions completed at the retail window. These calculated transaction times constitute part of the earned workhours for a retail unit. Managers consider earned workhours in making scheduling and staffing decisions.

The RDM also reports transactions completed at the APC. The APC Gain report shows the percentage of all revenue eligible for collection at the APC that actually was collected at the APC.<sup>5</sup> It also shows both the workhour savings achieved during a given time period attributable to the APC (based on the transactions performed at the APC and their associated time factors) and the savings that would have been achieved if all eligible transactions had been performed at the APC.

As more transactions are conducted at the APC and fewer at the retail window, earned workhours decrease. Therefore, if retail units increase the number of transactions conducted at the APC by implementing best practices, managers have an opportunity to capture workhour savings and reduce their costs — for example, by reducing overtime hours in response to fewer earned workhours.

## **OBJECTIVE, SCOPE, AND METHODOLOGY**

Our objective was to determine whether the Postal Service is using best practices with its currently deployed APCs. Specifically, we identified: (1) the Postal Service districts that collected the highest percentage of APC-eligible revenue at APCs; (2) the Postal Service districts that collected the lowest percentage of APC-eligible revenue at APCs; and (3) best practices used by the high-performing districts.

We conducted our work at the Central New Jersey, Northern New Jersey, Fort Worth, Dallas, Houston, Southeast Michigan, Detroit, and Lakeland Districts. We selected Houston because it collected the highest percentage of APC eligible revenue at APCs between October 2005 and March 2008, and Central New Jersey, Northern New Jersey, Fort Worth, and Dallas were also among the top 12 performers. Conversely, we selected the Southeast Michigan, Detroit, and Lakeland Districts because they were among the 12 districts that collected the lowest percentage of APC-eligible revenue at APCs.

Our scope included transactions at APCs between October 2005 and March 2008 and the practices used by retail units in order to generate transactions at APCs.

To accomplish our objectives, we:

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<sup>5</sup> For revenue to be APC-eligible, the customer must be able to complete the entire visit at the APC. For example, a visit that includes sending an international parcel weighing more than 1 pound would not generate APC-eligible revenue, even if the customer also purchased products or services that could have been obtained at the APC.

- Analyzed data from the RDM's APC Gain report between October 2005 and March 2008.
- Reviewed policies, procedures, training materials, and related documentation to determine what guidance is available to retail units on using APCs.<sup>6</sup>
- Interviewed headquarters and field officials to ascertain their strategies for successful APC use.
- Observed retail unit practices surrounding APC use within judgmentally selected districts. See [Appendix D](#) for a list of the district and field offices we visited.

We conducted this performance audit from June through November 2008 in accordance with generally accepted government auditing standards and included such tests of internal controls as we considered necessary under the circumstances. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective. We relied on data obtained from the RDM. We did not directly audit the RDM, but performed a limited data integrity test to support our data reliance. We discussed our observations and conclusions with management officials on September 8 and 12, 2008, and included their comments where appropriate.

## PRIOR AUDIT COVERAGE

Our report, *Deployment Strategy of Automated Postal Centers* (Report Number DR-AR-07-010, dated June 7, 2007), concluded that Postal Service deployment strategy for APC kiosks during Phase I was adequate. In addition, as of December 2006, officials identified and appropriately redeployed 170 underperforming APC kiosks. However, approximately 54 percent of APC kiosks did not meet the minimum revenue requirements in fiscal year (FY) 2006. Further, approximately 55 percent of APC kiosks did not meet the minimum revenue requirements as of the first quarter of FY 2007.

The report also concluded that the Postal Service could improve plans for future deployment of Phase II APC kiosks. The draft Decision Analysis Report (DAR) used Phase I transaction data, instead of actual transaction data from the Phase II candidate facilities, to calculate labor savings. As a result, the Postal Service's implementation of the Phase II purchase of 3,000 APC kiosks could result in a \$115 million loss during the next 7 years, instead of the \$243 million gain projected by the draft DAR.

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<sup>6</sup> Documentation reviewed includes Handbook PO-106, *Automated Postal Center Program*, November 2007; Automated Postal Center Host: Standard Operating Procedures; Automated Postal Center Postmaster's Communications Kit; Automated Postal Center Customer Service Advisor Guide; APC Information Book; and the APC website.

We recommended the Vice President, Delivery and Retail, revise, finalize, and distribute the APC instructional documents to area officials. We also recommended management reevaluate the draft DAR assumptions. Management agreed with our findings and recommendations. Management's actions should correct the issues identified in our report.

## APPENDIX B: DETAILED ANALYSIS

### Implementing Best Practices

In order to determine best practices, we obtained the APC Gain report for all 80 districts for the period from October 2005 through March 2008 (inclusive). We then ranked the districts according to the percentage of eligible revenue they collected at the APC. We judgmentally selected five districts from among those that collected the highest percentage of eligible revenue at the APC and three districts from among those that collected the lowest percentage. We visited each of the district offices selected, as well as two or three retail units within each district, to interview officials and observe retail practices. We then drew conclusions regarding best practices based on our interviews and observations. See [Appendix D](#) for a list of the district and field offices we visited.

The following districts collected the highest percentage of eligible revenue at their APCs between October 2005 and March 2008.

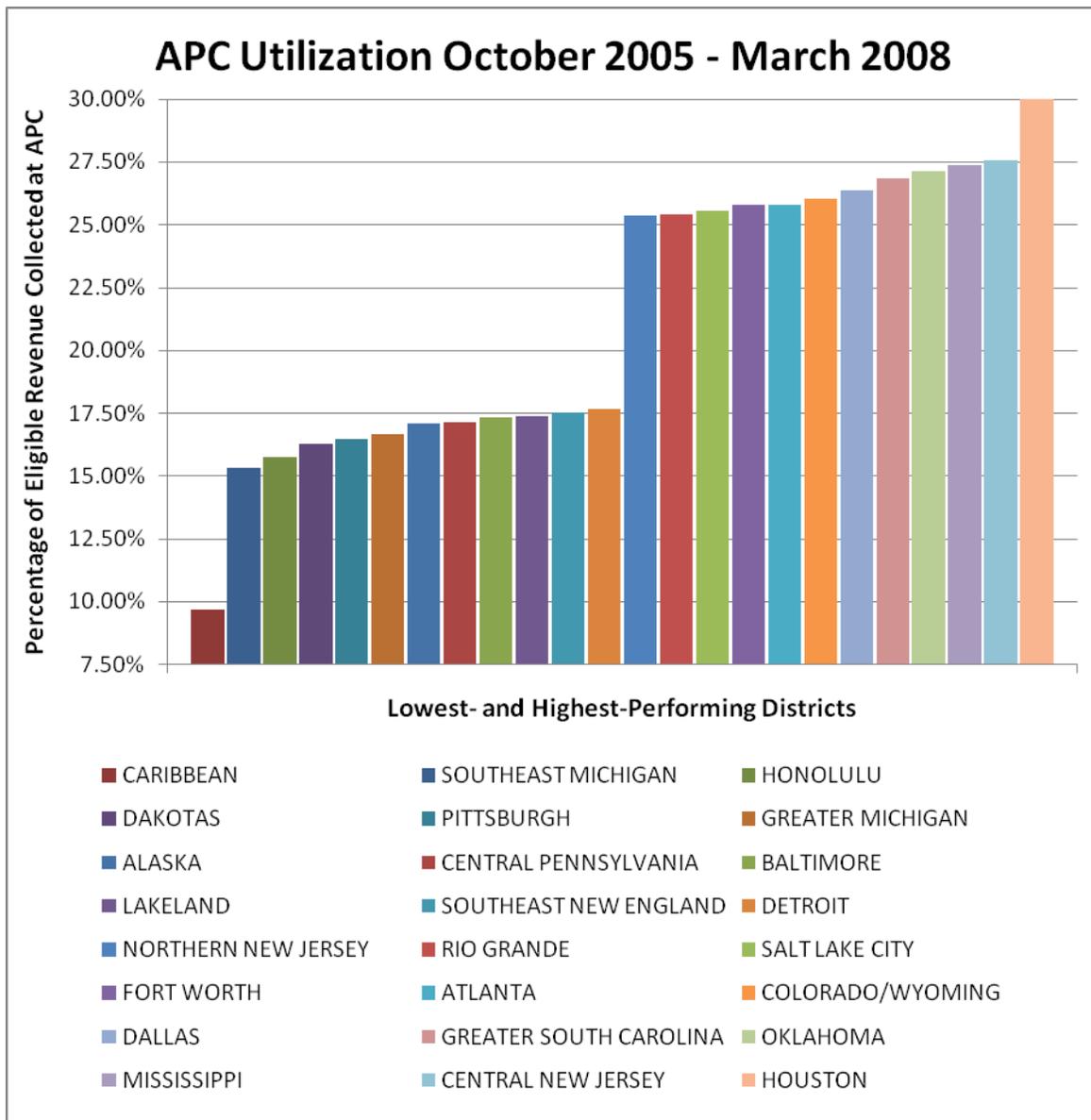
District	Percentage at APC	Rank
Houston	30.40	1
Central New Jersey	27.55	2
Mississippi	27.35	3
Oklahoma	27.14	4
Greater South Carolina	26.82	5
Dallas	26.35	6
Colorado/Wyoming	26.05	7
Atlanta	25.80	8
Fort Worth	25.78	9
Salt Lake City	25.54	10
Rio Grande	25.41	11
Northern New Jersey	25.38	12

Source: Retail Data Mart

The following districts collected the lowest percentage of eligible revenue at the APC between October 2005 and March 2008.

<b>District</b>	<b>Percentage at APC</b>	<b>Rank</b>
Caribbean	9.66	80
Southeast Michigan	15.29	79
Honolulu	15.73	78
Dakotas	16.26	77
Pittsburgh	16.46	76
Greater Michigan	16.62	75
Alaska	17.07	74
Central Pennsylvania	17.10	73
Baltimore	17.33	72
Lakeland	17.35	71
Southeast New England	17.49	70
Detroit	17.64	69

Source: Retail Data Mart



During our audit, we noted the following best practices.

**Establish and maintain oversight at the area level.** The five districts we visited within the highest-performing group were all in the New York Metro or Southwest Areas. Officials in these districts emphasized that their area vice presidents (AVPs) were aware of and interested in the APC program and provided practical oversight. According to them, area officials monitored APC performance and investigated when performance indicated potential problems. Further, AVPs participated in discussions about APCs and offered suggestions on promoting their use. For example, the New York Metro AVP suggested using the incentives discussed on page 14.

**Manage proactively on a daily basis at the district level.** Officials in the five highest-performing districts we visited all stated that they monitor the APC program daily and work proactively to identify and resolve problems. They use reports covering no stamp sales, daily revenue, candidate revenue achieved, and APC alerts to keep abreast of each retail unit's performance. They communicate daily with retail units, informing them of sales goals, their performance relative to goals and other units in the district, their performance relative to prior periods, and solutions to remedy lower-than-expected performance. Officials in these districts also noted that when a retail unit appears for more than 1 or 2 days on a report that indicates a problem (such as an APC not selling any stamps on a particular day), an official from the district office — up to and including the district manager — visits that unit to determine the cause and resolve the problem.

**Conduct active, daily management at the local level.** At each of the highest-performing districts we visited, local managers or supervisors said that they spend time each day to ensure their APCs succeed. In addition to reading and following up on any reports or communication they receive from the district office, they track their own performance, monitoring daily revenue, percent of APC-eligible revenue collected at the APC, their position compared to other retail units in the district, and APC stock levels. They ensure that the APC is well-stocked at all times and that supplies such as packaging materials are in a convenient, nearby location; perform regular, preventive maintenance on machines, such as cleaning interior and exterior parts; and immediately order any necessary replacement parts. They stated that as a result, they rarely receive APC alerts<sup>7</sup> and their APCs are rarely out of service. However, they noted that should they receive an APC alert, they initiate steps to clear the alert immediately.

Local managers or supervisors also stressed the importance of using a proactive APC host whenever possible. The host should be someone with good people skills and a thorough understanding of the APC. They said the ideal place to position the host is near the main entrance, where the host could immediately greet customers, ascertain whether their transactions could be completed at the APC, encourage them to try using the APC, and help them complete their transactions.

Local managers and supervisors also stated that window clerks play an important role in improving APC use, even if they are not serving as APC hosts. They do this by explaining to customers at the retail window the products and services that customers can obtain at the APC and encouraging them to try it during their next visit. At retail units with highly successful APCs, managers and supervisors have discussed with window clerks the concept that APCs do not threaten their jobs. Further, the window clerks now understand that diverting eligible transactions to APCs allows them to better serve customers who require face-to-face interaction and that APCs can reduce wait times in line, so the APCs are, therefore, another means of improving customer service.

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<sup>7</sup> Alerts are generated when a device on the APC requires service or to inform employees of a certain condition (for example, "Stamp booklet stock near empty").

**Offer incentives to station managers, postmasters, and APC hosts.** The high-performing districts offered periodic incentives to retail unit officials for outstanding APC performance. For example, in one district, the office that showed the greatest improvement in candidate revenue achieved during the same period last year, or the highest percentage increase in revenue, received a traveling trophy. In another district, the APC host with the best-performing machine received a token of appreciation such as a gift card to a local store.

**Offer incentives to customers for using APCs.** District and local officials said they periodically held contests for customers who used APCs and awarded prizes. For example, at one retail unit, APC customers could enter a raffle, and the winner received an iPod.

**Provide 24-hour access to APCs.** In all five high-performing districts, officials at the district or retail unit level stated that providing 24-hour access to APCs is an important contributor to making the machines successful. They noted that many operators of home-based businesses who mail numerous pieces in one visit enjoy the convenience of purchasing and printing postage during off-peak hours. Many business commuters also enjoy the convenience of using APCs on their way to or from work, when retail windows are often closed.

**Optimize hours of access to the retail window.** District and retail unit officials suggested that opening the retail window later or closing it earlier are effective ways to improve APC performance. They noted that they were able to do this without receiving many complaints from customers, while increasing revenue at the APC.

We observed several areas in which practices in the lowest-performing group differed from those in the highest-performing group. Examples follow.

- District officials did not communicate frequently enough with field offices and did not make frequent enough visits to retail units with APCs that performed poorly. District officials communicated with retail unit officials, including sending reports regarding APC performance, but this communication was not as frequent as in the high-performing districts. Also, the wide geographic area over which retail units are dispersed in some districts — such as Lakeland — made it difficult for district officials to visit many retail units.
- Local officials did not make sufficient use of available reporting tools. Local officials stated that they monitored relevant reports, but they did not do so on a daily basis.
- Local officials did not conduct preventive maintenance on APCs frequently enough. Some officials stated that they only conducted maintenance when they received an alert, and others said they did not perform regular or routine maintenance.

- Local officials did not always have support from window clerks.
- District or local officials had not considered reducing window hours.

In other instances, district and local officials from the lowest-performing group cited obstacles beyond their control that hindered their APCs' performances. These included:

- Local officials stated that replacement parts were not shipped in a timely manner, although they ordered parts as soon as they were needed.
- Local officials cited insufficient resources.
  - No employee was available to serve as the APC host.
  - There was insufficient space to place the APC in the best location.
- Local officials noted that their retail space configuration prevented 24-hour access to the APC. In one case, local officials had been working since October 2007 to obtain 24-hour access.
- Some local officials reported that their customer base was strongly pro-union. Many of these customers could not be convinced to use the APC because they felt they would be taking away an employee's job.
- District and local officials cited language barriers. They stated that many of their customers did not read English or Spanish well enough to use the APC.

### Other Matters

In several districts, officials mentioned that adding foreign language instructions (other than Spanish) would enhance the value of the APC for their customer base. According to Detroit District officials, for example, a significant portion of its large Arabic-speaking population does not read English well enough to use the APC. OIG officials also noted that digital signs directing customers to the APC and describing its main features could make more customers aware of the machine and encourage them to try it. These signs could be located either directly inside the entrance to the lobby or above the retail counter, where customers standing in line could see them. In several districts, officials pointed out that customers who make ReadyPost® purchases cannot use the APC; they suggested that adding scanners to the APCs could significantly increase their use. Finally, officials in one district noted that the Postal Service's emphasis on the Mystery Shopper program may be an impediment to fully realizing the APC's potential because the Mystery Shopper program rewards units partly based on the clerk's interaction with the customer. A concerted effort to guide customers to the APC may create the

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<sup>8</sup> ReadyPost products include envelopes, shipping containers, and packing materials sold at Post Offices.

appearance of a less customer-friendly environment, negatively affecting Mystery Shopper scores.

**APPENDIX C: CALCULATION OF FUNDS PUT TO BETTER USE**

Area/District	Potential Work-hour Savings A	Assumes 20 Percent of Potential Work-hours Are Saved B=A*20 percent	Actual Work-hour Savings C	Additional Workhours Saved by Improvements D=B-C	Annual Workhour Savings from Improvements E=D*2/5	2 Years' Workhour Savings from Improvements F=E*2	Monetary Impact G
<b>Great Lakes</b>							
Southeast Michigan	214,953	42,991	30,949	12,042	4,817		
Lakeland	208,407	41,681	32,733	8,948	3,579		
Greater Michigan	153,553	30,711	23,210	7,501	3,000		
<b>Subtotal</b>	576,913	115,383	86,891	28,491	11,397	22,793	\$876,283
<b>Eastern</b>							
Pittsburgh	87,943	17,589	11,288	6,301	2,520		
Central Pennsylvania	111,717	22,343	16,350	5,993	2,397		
<b>Subtotal</b>	199,659	39,932	27,638	12,293	4,917	9,835	378,098
<b>Western</b>							
Dakotas	43,501	8,700	6,840	1,861	744		
Alaska	42,817	8,563	7,907	656	263		
<b>Subtotal</b>	86,318	17,264	14,747	2,517	1,007	2,014	77,415
<b>Capital Metro</b>							
Baltimore	144,908	28,982	24,933	4,049	1,620	3,239	124,526
<b>Pacific</b>							
Honolulu	137,379	27,476	23,260	4,216	1,686	3,373	129,656
<b>Northeastern</b>							
SE New England	61,728	12,346	9,453	2,893	1,157	2,314	88,976
<b>Totals</b>	<b>1,206,906</b>	<b>241,381</b>	<b>186,922</b>	<b>54,459</b>	<b>21,784</b>	<b>43,568</b>	<b>\$1,674,953<sup>9</sup></b>

Source: Retail Data Mart (Columns A, C)

Potential workhour savings (Column A) is the product of all APC-eligible transactions at retail units multiplied by their associated transaction times, regardless of whether the transactions took place at the retail window or the APC. Actual workhour savings (Column C) is the product of all transactions completed at the APC multiplied by their associated transaction times. These transactions constitute a savings in workhours because if they had been conducted at the retail window, earned workhours would have increased.

<sup>9</sup> Actual totals may be slightly higher or lower because of rounding.

From October 2005 through March 2008, the 10 lowest-performing districts achieved an actual savings of 186,922 workhours (Columns C), 15.5 percent of their 1,206,906 potential workhour savings. If those 10 districts had achieved 20.0 percent of their potential savings,<sup>10</sup> an additional 54,459 workhours would have been saved during the period (Column D). Because this additional savings covers a 2.5-year period, multiplying by 2/5 produces an average annual savings of 21,784 workhours (Column E).

The Postal Service has an opportunity to capture workhour savings by implementing the best practices described in this document nationwide. Assuming that the overall level of transactions and revenue at retail units remains stable, if the 10 lowest-performing districts captured the workhour savings associated with raising their performance from 15.5 percent to 20.0 percent and correspondingly reduced overtime hours, they would create \$1,674,953 in funds put to better use over the next 2 years (Column G).<sup>11</sup>

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<sup>10</sup> The national average for the time period was 20.6 percent.

<sup>11</sup> At an average hourly overtime rate of \$38.445, 21,783.752 hours per year for 2 years = \$1,674,952.69128.

**APPENDIX D: DISTRICT AND FIELD OFFICES VISITED**

**Highest-Performing**

<b>Districts</b>	<b>Field Offices</b>
Houston	River Oaks
	Panther Creek
	Klein
Central New Jersey	Kendall Park
	East Brunswick
	Edison
Dallas	Plano Northwest
	Flower Mound
	Irving Valley Ranch
Fort Worth	Ridglea
	North Richland Hills
	Keller
Northern New Jersey	Westfield
	Rahway
	Elizabeth

**Lowest-Performing**

<b>Districts</b>	<b>Field Offices</b>
Southeast Michigan	[REDACTED]
	[REDACTED]
Lakeland	[REDACTED]
	[REDACTED]
Detroit	[REDACTED]
	[REDACTED]

**APPENDIX E: MANAGEMENT'S COMMENTS**

Redacted

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