



Office of Inspector General | United States Postal Service

Audit Report

Air Mail Not Moving As Assigned

Report Number 21-130-R22 | March 2, 2022



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Highlights

Background

The U.S. Postal Service spent about \$3 billion to transport mail via air in fiscal year (FY) 2021, an increase of about \$53 million over FY 2020. These costs consisted of contracted services from [REDACTED], commercial airlines, [REDACTED], auxiliary transportation, supplemental ad hoc charters, and terminal handling services (THS) operations.

The air network relies on Postal Service processing facilities to tender mail timely and to use volume arrival profiles (VAP) to support efficiency in THS operations. The VAP details the hourly percentage of mail Postal Service facilities are required to deliver to THS facilities while still allowing THS personnel enough time to prepare and tender the mail to the appropriate airline.

What We Did

Our objective was to determine why mail does not move on assigned air carriers or moves to the wrong [REDACTED], and the impact that reallocations of air mail have on the Postal Service.

What We Found

The Postal Service transported nearly all air mail on the planned air network and to the appropriate [REDACTED]. While the amount of air mail transported on the wrong network or to an incorrect [REDACTED] represents less than 1 percent of total air mail annually, it increased from FYs 2018 through 2021. Specifically, the Postal Service transported about 51.3 million pounds of mail originally assigned to lower cost air carriers on the more costly [REDACTED] network. During the same period, the Postal Service transported about 5 million pounds of mail to the wrong [REDACTED]. We estimate the Postal Service incurred about \$9.9 million annually for FYs 2020 and 2021 by moving mail through the wrong network and hub.

Furthermore, operational meetings were not conducted as intended to resolve operational issues, such as meeting VAP requirements and incorrectly routing mail to the wrong network.

Lastly, we identified several best practices for the timely processing and tendering of mail. If implemented nationwide, these best practices may reduce the amount of mail tendered to the wrong air carrier or [REDACTED].

Recommendations

We recommended management reinforce THS requirements for routing mail on the correct air network and to the correct hub; reinforce VAP requirements at mail processing facilities; reinforce the requirement to address issues identified in operational meetings; and consider implementing best practices for displaying updated signage and daily container quality checks at mail processing facilities.

The U.S. Postal Service spent about \$3 billion to transport mail via air in fiscal year (FY) 2021, an increase of about \$53 million over FY 2020.



Transmittal Letter



OFFICE OF INSPECTOR GENERAL
UNITED STATES POSTAL SERVICE

March 2, 2022

MEMORANDUM FOR: ROBERT CINTRON
VICE PRESIDENT, LOGISTICS

MICHAEL L. BARBER
VICE PRESIDENT, PROCESSING AND MAINTENANCE
OPERATIONS

A handwritten signature in black ink, reading "Melinda M. Perez", is centered below the memorandum text.

FROM: Melinda M. Perez
Deputy Assistant Inspector General
for Mission Operations

SUBJECT: Audit Report – Air Mail Not Moving as Assigned
(Report Number 21-130-R22)

This report presents the results of our audit of Air Mail Not Moving as Assigned.

We appreciate the cooperation and courtesies provided by your staff. If you have any questions or need additional information, please contact Wilvia Espinoza, Director, Transportation, or me at 703-248-2107.

Attachment

cc: Postmaster General
Corporate Audit Response Management

Results

Introduction/Objective

This report presents the results of our self-initiated audit of Air Mail Not Moving As Assigned (Project Number 21-130). Our objective was to determine why mail does not move on its assigned air carrier or moves to the wrong [REDACTED], and the impact these reallocations have on the U.S. Postal Service. See [Appendix A](#) for additional information about this audit.

Background

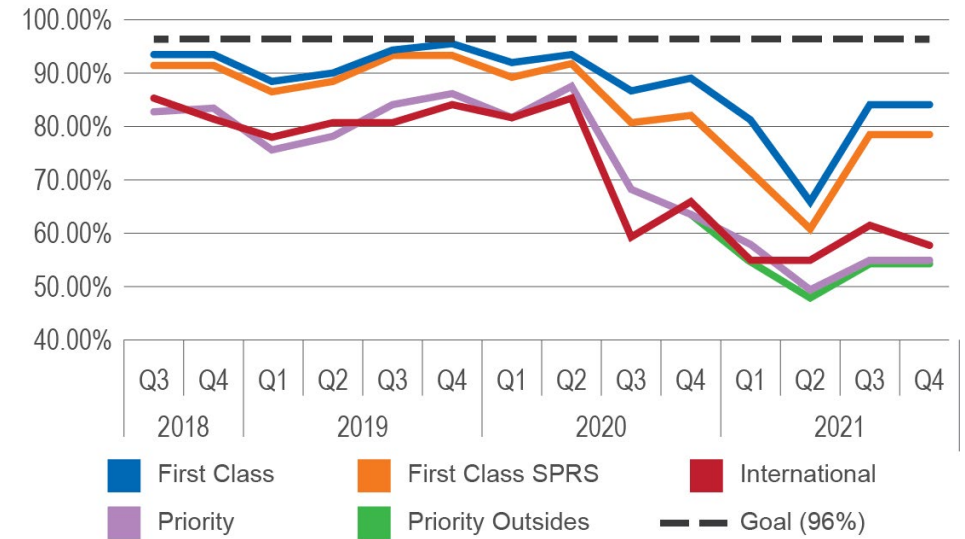
The Postal Service spent about \$3 billion on air transportation costs in fiscal year (FY) 2021 — an increase of about \$53 million over FY 2020.¹ These costs consisted of contracted services from [REDACTED] commercial airlines,² [REDACTED], auxiliary transportation,³ charters (ad hoc),⁴ and terminal handling services (THS) operations.⁵

The Postal Service uses a forecasting model to estimate the mail volume to be transported by air six months in advance.⁶ The model allocates the forecasted mail volume across the available air carriers by optimizing for cost and service. The Postal Service aims to allocate mail to carriers in the following order:

- [REDACTED] which provides limited airlift and specified destinations.
- Auxiliary transportation, where the Postal Service is purchasing all or part of a private plane.
- Commercial airlines, which is the least expensive.
- [REDACTED], which is the most expensive carrier but has the most available airlift and services more than [REDACTED] percent of the Postal Service’s mail volume.

[REDACTED] transports First-Class, First-Class Small Parcels and Rolls (SPRS), International, Priority, and Priority Outsides.⁷ Per its contract with the Postal Service, [REDACTED] is required to meet an on-time service performance goal of 96 percent.⁸ As shown in Figure 1, [REDACTED] did not meet the performance goal during any quarter from FYs 2018 through 2021, and its service performance has declined since Quarter 3, FY 2020.

Figure 1. [REDACTED] Service Performance (FYs 2018 – 2021)



Source: Postal Service Informed Visibility system and U.S. Postal Service Office of Inspector General (OIG) analysis.

The Postal Service plans air transportation routes about six months before the start of the [REDACTED] contract operating period and assigns mail volume to

1 The Postal Service’s operating expenses have been impacted by the pandemic. An increase in package volume resulted in higher air transportation costs due to lower availability of commercial air flights and certain general pandemic-related inefficiencies in the workplace.
 2 Federal restrictions limit the size and weight of mail carried by commercial air carriers.
 3 Auxiliary transportation consists of supplemental contracts with [REDACTED].
 4 Any need for space that cannot be met by the air network service providers is mitigated by ad hoc transportation.
 5 THS are responsible for transferring mail between the Postal Service and its aviation suppliers.
 6 The Postal Service transports First-Class Letters, First-Class Flats, Remittance Mail, First-Class Parcels, Priority Parcels, Priority Flats, and letters using the air network.
 7 Non-machinable packages.
 8 [REDACTED]

transportation routes by capacity and cost. Dispatch and Routing (D&R) labels — which identify the date, transportation routing, mail class, and air carrier for the containers — are printed and affixed to the container of mail. The Postal Service processes and tenders the mail traveling on the air network to the appropriate air carrier identified on the D&R label.

Mail traveling through the [REDACTED] air network is transported from Postal Service mail processing facilities to one of the 69 THS suppliers nationwide. THS suppliers prepare and transport mail for its intended [REDACTED]. The air network relies on Postal Service processing facilities to tender mail timely and to follow pre-determined volumes, also known as Volume Arrival Profiles (VAP). The VAP details the hourly percentage of mail Postal Service facilities are required to deliver to THS sites while still allowing enough time for THS personnel to prepare and tender the mail to the appropriate airline.

Once mail arrives at a THS facility, employees affix D&R labels to identify whether it is scheduled for a single location or is destined for multiple locations, which will require an additional sort at the [REDACTED]. D&R labels also identify whether mail is intended to pass through a [REDACTED] or will be on a direct flight.

We conducted site observations at 12 sites: Los Angeles, Industry, Royal Palm, Salt Lake City, Provo, North Texas, Fort Worth, Philadelphia, and Greater Newark Processing and Distribution Centers (P&DC); the Philadelphia and New Jersey Network Distribution Centers; and the Salt Lake City Air Surface Facility.

Findings Summary

The Postal Service transported nearly all air mail on the planned air network and to the appropriate [REDACTED]. However, the amount of air mail transported on the wrong network along with the amount of air mail transported to an incorrect [REDACTED] increased over the last four years. Additionally, THS contractors and Postal Service management did not effectively address and resolve issues via monthly meetings.

Finding #1: Mail Transported Incorrectly

From FYs 2018 through 2021, the Postal Service transported about 51.3 million pounds of mail originally assigned to lower cost air carriers on the more costly [REDACTED] network. During the same period, the Postal Service transported about 5 million pounds of mail to the wrong [REDACTED] (see Table 1). While these amounts represent less than 1 percent of total air mail, they have increased in the last four years.

Table 1. Mail Sent on the Wrong Network or to the Wrong [REDACTED] (FYs 2018 – 2021)⁹

	FY 2018	FY 2019	FY 2020	FY 2021	Total
Pounds of Mail Sent on Wrong Network	2,336,664	8,569,295	21,867,069	18,574,416	51,347,444
Pounds of Mail Sent to Wrong [REDACTED]	650,179	841,371	1,452,443	2,115,634	5,059,627
Total Air Mail Pounds	2,267,383,814	2,318,878,987	2,555,145,023	2,698,623,205	9,840,031,029
Percent of Air Mail Sent on Wrong Network and to [REDACTED] ¹⁰	0.13%	0.41%	0.91%	0.77%	0.57%

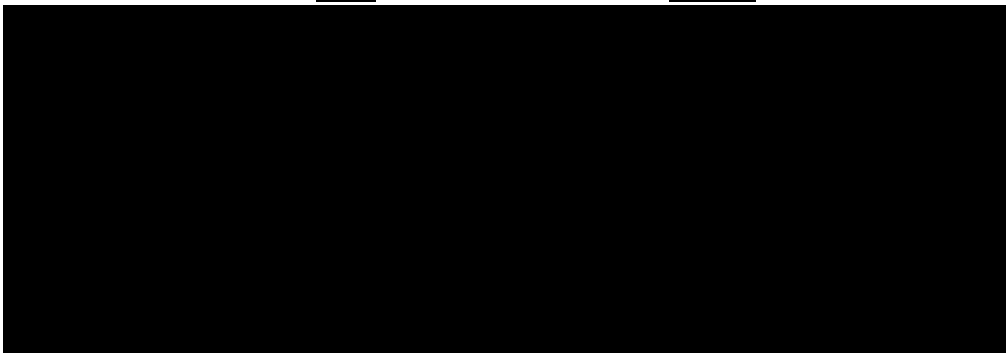
Source: Postal Service Enterprise Data Warehouse System (EDW) and [REDACTED]

⁹ To meet service requirements, the Postal Service may have a legitimate business need to move mail to a different network. However, the Postal Service does not track mail changes to different networks for legitimate business needs.

¹⁰ Percentage of air mail sent on wrong network and to [REDACTED] was calculated by adding the pounds of mail sent on wrong network and [REDACTED] and dividing it by the total air mail pounds.

Air mail did not move as assigned because employees were not properly trained on how to identify and move the mail. We interviewed 24 management personnel at 12 mail processing facilities to determine whether staff were trained on how to process air mail. During our observations, we found mis-labeled containers of mail at mail processing facilities and mail that was not always correctly separated by air carrier. For example, on July 21, 2021, we found a container of [REDACTED] mail at [REDACTED] labeled for the [REDACTED] THS; however, that THS did not process mail for [REDACTED]. In another example, Figure 2 shows a container with a label indicating it was to be transported on [REDACTED] when it incorrectly contained mail assigned to [REDACTED]. According to policy,¹¹ placards are essential in routing, directing, and transporting mail and equipment to its intended destination. In addition, mail must be sorted by air carrier and placed in the appropriate container so that it is sent to the correct location.¹²

Figure 2. Misrouted [REDACTED] Mail Comingled with [REDACTED] Mail



Source: OIG photographs taken at the [REDACTED] on July 21, 2021.
NOTE: Picture on left shows container to be transported to [REDACTED] and picture on right shows mail intended for [REDACTED] (airline code code is [REDACTED]) inside the container.

Additionally, air mail did not move as assigned because mail processing facilities were not following hourly mail volume requirements. Specifically, mail volume arrival at the THS should be aligned with transportation schedules to meet or exceed the planned VAP.¹³ The purpose of an hourly plan is to give an accurate schedule that THS sites can use to predict the incoming flow of mail throughout the operational shift. THS staff should have enough time to prepare and tender the mail. However, because the percentage of mail received either did not meet or exceed the planned VAP, THS sites¹⁴ were unable to maximize the planned air container utilization.

“Air mail did not move as assigned because employees were not properly trained on how to identify and move the mail.”

The Postal Service experienced management shortages¹⁵ due to restructuring and hiring of new managers that caused air mail to not move as assigned. The COVID-19 pandemic further impacted employee availability,¹⁶ which played a role in mail not moving as assigned. The Postal Service is currently addressing management shortages, employee availability, and COVID-19 impacts as reported in the postal service organizational restructure¹⁷ and a previous OIG report (*Nationwide Service Performance*, Report Number 21-120-R21, dated September 20, 2021). Therefore, we are not making recommendations regarding these issues.

When mail is assigned to a carrier and subsequently placed on the wrong network or sent to the incorrect [REDACTED], the Postal Service incurs additional transportation costs. We estimated the Postal Service incurred questioned costs of about \$9.9 million annually for FYs 2020 and 2021.¹⁸ If the Postal Service properly trains employees and reinforces VAP requirements, it could save about

11 *Managed Transport Equipment Labeler* (MTEL) User Guide Version 1.2, updated May 7, 2020.

12 Processing Operations Management Order, POMO-006-19, August 8, 2019.

13 Terminal Handling Service Contract – Air Cargo Network, Attachment D.

14 We conducted site visits at the THS suppliers and P&DCs from July 19 to September 17.

15 As of September 30, 2021, the 12 sites visited had a total of 88 vacant EAS positions.

16 Employee availability at Postal Service facilities ranged from 67 percent to 84 percent, with an average weekly employee availability of 76 percent.

17 Town Hall Product Solutions Organizational Restructure update, dated May 19, 2021.

18 The OIG was unable to remove costs associated with moving mail on a different network due to legitimate business needs because the Postal Service does not track such data.

\$9.9 million annually in FYs 2022 and 2023. Lastly, when the Postal Service gives [REDACTED] mail in lieu of giving it to the assigned lower cost carrier, it is not only at risk of paying more to move the mail but is also at risk of schedule delays due to the additional sorting required. These type of delays in the [REDACTED] network could affect the Postal Service's service performance.

Recommendation #1

We recommend the **Vice President, Processing and Maintenance Operations**, in coordination with the **Vice President, Logistics**, reinforce procedures for mail processing personnel to ensure they are following the terminal handling services requirements for routing mail on the correct network and hub.

Recommendation #2

We recommend the **Vice President, Processing and Maintenance Operations**, in coordination with the **Vice President, Logistics**, reinforce the volume arrival profile requirements at mail processing facilities to ensure mail is tendered in accordance with the terminal handling service and [REDACTED] contracts.

Finding #2: Operational Meetings

We found management did not conduct operational meetings as intended to resolve issues, such as incorrectly routing mail to the wrong network and employees not following the VAP requirements. These meetings — known as Delegates Assigned to Generate Growth and Evaluate Resolutions (DAGGER) meetings — are typically conducted locally at the THS facility, the postal facility, or via teleconference on a monthly basis. [REDACTED], THS, and Postal Service representatives attend these meetings to address issues with tendering mail. We interviewed THS site managers and local Postal Service management and reviewed the monthly DAGGER meeting minutes and found that Local Postal Service management at all 12 mail processing facilities we visited were either not familiar with the DAGGER meetings and did not attend or did not have clear direction on the purpose of these meetings.

The THS contract¹⁹ states that the THS contractor shall maintain a contact person to interface with Postal Service officials and Headquarters and Air Transportation Office personnel as designated by the contracting officer. The THS contractor's contact person must be available to attend and participate in these DAGGER meetings. When meeting participants do not raise and resolve issues, [REDACTED]

Recommendation #3

We recommend the **Vice President, Logistics**, reinforce the requirement for Postal Service liaisons conducting the monthly Delegates Assigned to Generate Growth and Evaluate Resolutions meetings to address ongoing terminal handling service issues and consult headquarters to identify potential resolutions for implementation.

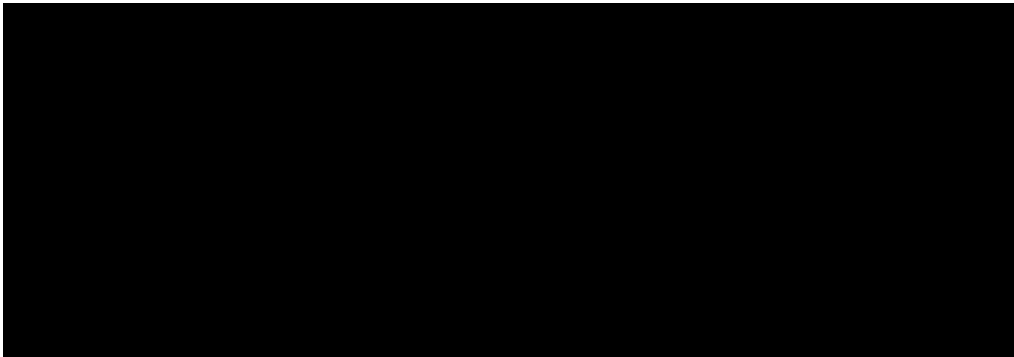
Best Practices

During our site visits at three of the 12 mail processing facilities, we identified several best practices for the timely processing and tendering of mail. Specifically:

- Royal Palm, FL, P&DC management completed a project to decrease the percentage of mail arriving at the [REDACTED] THS after 3:00 a.m.
- Industry, CA, P&DC management monitored air mail processing operations to prevent mail going to the wrong destination, compiled a daily Container Quality Report, communicated findings to other management, and trained employees to read D&R labels.
- Philadelphia, PA, P&DC management updated the signage for employees to easily interpret D&R labels, which help them correctly separate the mail by air carrier. For example, in [Figure 3](#), the arrows in the left picture show how to read a D&R label and the arrow in the right picture shows the Universal Routing Sorting Aide code for mail that should go to the [REDACTED]. Management also shared a headquarters presentation with employees who handle mail assigned to the air network.

¹⁹ Terminal Handling Service Contract – Air Cargo Network, Statement of Work, Section 1 – Administration.

Figure 3. Dispatch and Routing Label Signage



Source: OIG photographs taken at the Philadelphia P&DC on August 25, 2021.

If implemented nationwide, these best practices may reduce the amount of mail tendered to the wrong air carrier or [REDACTED]

Recommendation #4

We recommend the **Vice President, Processing and Maintenance Operations**, in coordination with the **Vice President, Logistics**, consider implementing-as applicable at mail processing facilities-best practices that may include displaying updated dispatch and routing signage and daily container quality checks.

Management's Comments

Management partially agreed with the findings, agreed with recommendations 1 and 3, partially agreed with recommendation 2, and disagreed with recommendation 4 and the monetary impact. See [Appendix B](#) for management's comments in their entirety.

Regarding the methodology used to calculate the monetary impact, management stated that they had concerns regarding calculations of specific products using general densities, which overstated the monetary impact. Management also stated they reviewed their concerns with the OIG and Postal Service management on February 3, 2022.

Regarding recommendation 1, management stated that they will reinforce procedures through training for mail processing personnel. The target implementation date is May 31, 2022.

Regarding recommendation 2, management stated that the audit ignores or minimizes the daily plant conditions that make the VAP unachievable on some days. However, management agreed to continue reinforcing the requirements related to the VAP. The target implementation date is May 31, 2022.

Regarding recommendation 3, management stated that they will reestablish guidelines pertaining to the structure and frequency of DAGGER meetings and also stated that they will track the meetings monthly for compliance. The target implementation date is March 31, 2022.

Regarding recommendation 4, management stated that they have processes in place to ensure proper handling of mail based on current conditions and good business practices.

Evaluation of Management's Comments

The OIG considers management's comments responsive to recommendations 1, 2, and 3 and the corrective actions should resolve the issues. We consider management's comments nonresponsive to recommendation 4.

Regarding management's concern that the audit ignored or minimized legitimate business decisions that must be made to move mail timely, we recognize and agree that there are legitimate business needs for moving mail. As stated in the report, the OIG was unable to remove costs associated with moving mail on a different network due to legitimate business needs because the Postal Service does not track such data.

Regarding the monetary impact, we revised the methodology using product-specific densities that the Postal Service provided on February 14, 2022, and we have revised the updated monetary impact in the report. We believe that our analysis is reasonable and there is potential to reduce the cost of moving mail through the wrong network and hub.

Regarding recommendation 4, management did not consider implementing the best practices that we observed during our site visits, such as displaying updated dispatch and routing signage and daily container quality checks as applicable. These best practices may reduce the amount of mail tendered to the [REDACTED] [REDACTED] or [REDACTED]. We view recommendation 4 as unresolved and will work with management through the audit resolution process.

All recommendations require OIG concurrence before closure. Consequently, the OIG requests written confirmation when corrective actions are completed. Recommendations should not be closed in the Postal Service's follow-up tracking system until the OIG provides written confirmation that the recommendations can be closed.

Appendices

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Appendix A: Additional Information

Scope and Methodology

The scope of this project was to review mail assigned to lower cost air carriers but was transported on [REDACTED], and to the [REDACTED] but traveled through a different hub based on D&R label scans for the period of FYs 2018 through 2021.

To accomplish our objective, we:

- Conducted site visits to observe the mail transportation process from mail processing facilities to THS sites.
- Interviewed all relevant Postal Air Transportation Operations officials.
- Reviewed policies, procedures, audit reports, and other relevant material related to dispatching and routing mail.
- Collected and analyzed Postal Service data on the volume of mail (in pounds) processed on the [REDACTED] network that was assigned to other air carriers for FYs 2018 through 2021.
- Collected and analyzed Postal Service data on volume of mail (in pounds) that was assigned for transport to the [REDACTED] but went through a different hub for FYs 2018 through 2021.

- Performed a cost analysis based on air carrier contract rates for FYs 2018 through 2021.
- Collected and analyzed [REDACTED] service performance on Priority and First-Class mail.

We conducted this performance audit from April 2021 through March 2022 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 discussed our observations and conclusions with management on January 21, 2022, and included their comments where appropriate.

We assessed the reliability of the Postal Service's EDW, Informed Visibility, Logistics Contract Management System, and [REDACTED] invoices by interviewing knowledgeable agency officials, reviewing related documentation, and testing for completeness and validity by recalculating the data and searching for any anomalies. We determined that the data were sufficiently reliable for the purposes of this report.

Prior Audit Coverage

Report Title	Objective	Report Number	Final Report Date	Monetary Impact (in millions)
<i>Management Alert – Air Mail Not Moving as Assigned at the Los Angeles Terminal Handling Services</i>	Provide Postal Service officials immediate notification of issues identified during our ongoing audit of Air Mail Not Moving as Assigned (Project Number 21-130). The issues require immediate attention and remediation.	21-201-R21	9/16/2021	\$9.9
<i>Transportation Network Optimization and Service Performance</i>	Assess opportunities to optimize the Postal Service's transportation network and meet service performance goals.	21-144-R20	6/5/2020	\$199.6
<i>Management Alert – Charter Flights</i>	Provide Postal Service officials immediate notification of issues identified during project 19XG002NL000-R20.	NL-MT-19-002	9/5/2019	None
<i>Terminal Handling Services – Southern Area</i>	Assess the effectiveness THS facilities the Postal Service uses to sort and transport mail in the Southern Area.	NL-AR-18-009	7/27/2018	\$4.5
<i>U.S. Postal Service Transportation Network Operations and Cost Optimization Practices</i>	Analyze practices and cost trends and identify risk areas in the Postal Service's transportation network.	19XG002NL000-R20	11/7/2019	\$31
<i>Air Cargo Contract Compliance</i>	Assess contractual compliance and oversight of the Postal Service's air transportation agreements (with aviation supplier or supplier).	20-127-R20	9/30/2020	None

Appendix B: Management's Comments



February 8, 2022

JOHN CIHOTA
DIRECTOR, AUDIT SERVICES

SUBJECT: Management Response: Air Mail Not Moving As Assigned
(Report Number 21-130-DRAFT)

Thank you for providing the Postal Service with an opportunity to review and comment on the findings and recommendations contained in the draft audit report, *Air Mail Not Moving As Assigned*.

Management disagrees with Finding #1: Mail Transported Incorrectly. The audit ignores or minimizes legitimate business decisions that must be made to move mail timely in the challenging transportation environment. The statement that air mail did not move as assigned due to a lack of training is not demonstrated. The true error rate is very low compared to the volume of mail correctly moved daily.

The findings related to the Volume Arrival Profiles (VAP) also disregard the processing environment, including variations in the arrival time of mail. The VAPs are created based on historical data and are accurate overall, but plants deal with many variables. An excessive number of bypass containers, for example, can impact the VAP unless containers are dispatched which contain little volume.

The audit also stated that USPS experienced management shortages due to restructuring and hiring of new managers that caused air mail not to move as assigned. There was no causal evidence provided to support this assumption.

Management does not agree with the monetary impacts as stated in the report. Management has conveyed the concerns regarding calculations of specific products using general densities which overstates the monetary impact. This has been reviewed with all parties; OIG and USPS via web meeting on February 3rd at noon EST.

Following are our comments on each of the four recommendations.

Recommendation [1]:

We recommend the **Vice President, Processing and Maintenance Operations**, in coordination with the **Vice President, Logistics**, reinforce procedures for mail processing personnel to ensure they are following the terminal handling services requirements for routing mail on the correct network and hub.

Management agrees with this recommendation. USPS will reinforce procedures through training for mail processing personnel.

Target Implementation Date:

05/31/2022

Responsible Official:

Senior Director Strategic Planning & Implementation

Recommendation [2]:

We recommend the **Vice President, Processing and Maintenance Operations**, in coordination with the **Vice President, Logistics**, reinforce the volume arrival profile requirements at mail processing facilities to ensure mail is tendered in accordance with the terminal handling service and [REDACTED] contracts.

Management Response/Action Plan:

Management partially agrees with this recommendation. The audit ignores or minimizes the daily end to end plant conditions that make the VAP unachievable on some days. USPS will continue to reinforce the requirements related to the volume arrival profile.

Target Implementation Date:

05/31/2022

Responsible Official:

Senior Director Strategic Planning & Implementation

Recommendation [3]:

We recommend the **Vice President, Logistics**, reinforce the requirement for Postal Service liaisons conducting the monthly Delegates Assigned to Generate Growth and Evaluate Resolutions meetings to address ongoing terminal handling service issues and consult headquarters to identify potential resolutions for implementation.

Management Response/Action Plan:

Management agrees with this recommendation
Management will re-establish the guidelines pertaining to the structure and frequency of DAGGER meetings. Meetings will be tracked monthly for compliance.

Target Implementation Date:

03/31/2022

Responsible Official:

Manager, Air Operations Field

Recommendation [4]:

We recommend the **Vice President, Processing and Maintenance Operations**, in coordination with the **Vice President, Logistics**, consider implementing—as applicable at mail processing facilities—best practices that may include displaying updated dispatch and routing signage and daily container quality checks.

Management Response/Action Plan:

Management disagrees with this recommendation. USPS has processes in place to ensure proper handling of the mail based on current conditions and good business practice.

Target Implementation Date:

N/A

Responsible Official:

N/A



Robert Cintron
Vice President, Logistics



for Mike L. Barber
Vice President, Processing &
Maintenance Operations

cc: Manager, Corporate Audit Response Management

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