

June 30, 2009

LINDA J. WELCH ACTING VICE PRESIDENT, DELIVERY AND POST OFFICE OPERATIONS

SUBJECT: Audit Report – Vehicle Maintenance Facilities Scheduled Maintenance – National Capping Report (Report Number DR-AR-09-007)

This capping report focused on vehicle maintenance facility (VMF) operations nationwide (Project Number 09XG001DR000). Our objectives were to assess the: (1) monitoring and managing of VMF operations for effective and efficient use of resources, and (2) completeness of cost data impacting the overall VMF operational environment. This report focuses on improving operations from a headquarters perspective. See Appendix A for additional information about this audit.

Conclusion

Monitoring Maintenance and Managing Resources

VMF management effectively completed the majority of required scheduled maintenances; however, additional improvements were necessary in the areas to ensure all required maintenance was completed and resources used efficiently. By completing all maintenances and better optimizing the available VMF and contractor resources, the Postal Service could save an estimated \$195 million over 10 years.¹ We concluded in this report improved monitoring of vehicle maintenance completion and management of resources by Postal Service Headquarters can also further improve vehicle maintenance operations. Specifically,

 The existing Vehicle Management Accounting System (VMAS) process did not have the ability to track completed scheduled maintenance – it only counted maintenance-in-arrears. Insufficient controls allowed maintenance personnel to remove vehicles from "maintenance not completed" status (maintenance-inarrears) by adjusting the schedule – resulting in some vehicles not receiving timely maintenance.

¹ The U.S. Postal Service Office of Inspector General (OIG) issued nine area audits on schedule maintenance performance and use of resources. The recommendations included in the area reports should correct the majority of the issues identified in the audits.

This report has not yet been reviewed for release under FOIA or the Privacy Act. Distribution should be limited to those within the Postal Service with a need to know.

• Headquarters Vehicle Operations did not have a process to help VMFs optimize resources.

Completing all required scheduled maintenance reduces the likelihood of vehicle breakdown and vehicle safety problems. Effective use of VMF and local commercial resources reduces the Postal Service's overall maintenance cost.

During the audit, Postal Service Headquarters began developing a Vehicle Operations Workload Criteria Model to improve the utilization of VMF and commercial resources. See Appendix B for more information about this topic.

We recommend the Acting Vice President, Delivery and Post Office Operations:

- 1. Ensure Vehicle Management Accounting System or its replacement system has the capability to easily track vehicles with completed maintenances.
- 2. Institute a policy discontinuing the practice of adjusting the vehicle maintenance schedules for the sole purpose of eliminating vehicles from the "maintenance not completed" status maintenance-in-arrears.
- 3. Implement the Vehicle Operations Workload Criteria Model to optimize the utilization of Vehicle Maintenance Facility and commercial resources.

Contract Repair and Maintenance Costs

The Postal Service's VMAS did not include all costs necessary to ensure appropriate fleet decisions. During fiscal year (FY) 2008, approximately 31 percent – more than \$40 million² – of repair and maintenance costs performed by local commercial vendors were not captured in the VMAS.³

These costs were not included primarily because management of the VMFs and vehicle post office (VPO) officials did not ensure VMFs received copies of all contract repair and maintenance invoices. As a result, Postal Service management did not always have complete information to make the most appropriate fleet and vehicle complement decisions. We will report the \$40,505,382 as unrecoverable unsupported questioned costs⁴ in our Semiannual Report to Congress. See Appendix B and Appendix C for more information about this topic.

² This amount is approximately 6 percent of the total vehicle maintenance and repair costs for FY 2008.

³ The area audits excluded some sites from review because of the difficulty in verifying all work performed by contractors during FY 2007.

⁴ An unsupported cost is a cost the OIG questions because of missing or incomplete documentation or because of failure to follow required procedures.

We recommend the Acting Vice President, Delivery and Post Office Operations:

4. Establish an effective process for ensuring vehicle maintenance facility management and vehicle post office management include all contract repair and maintenance costs in the Vehicle Management Accounting System or its replacement system.

Management's Comments

Management agreed with the findings in their initial comments, and in subsequent correspondence, they also agreed with the recommendations and monetary impact. Specifically, management plans to pursue maintenance tracking requirements in the replacement system for VMAS and institute a policy discontinuing the adjusting of vehicle maintenance schedules to eliminate vehicles from maintenance in arrears. They also plan to implement the Vehicle Operations Workload Criteria Model to optimize the utilization of resources, and establish an effective process for including all repair and maintenance costs in VMAS or its replacement. We have included management's comments in their entirety in Appendix D.

Evaluation of Management's Comments

The OIG considers management's comments responsive to the recommendations and management's corrective actions should resolve the issues identified in the report. With the exception of the VMAS replacement, management should address the other recommendations by September 2009.

The OIG considers recommendation 4 significant, and therefore requires OIG concurrence before closure. Consequently, the OIG requests written confirmation when management completes corrective actions. This recommendation should not be closed in the Postal Service's follow-up tracking system until the OIG provides written confirmation that the recommendation can be closed.

We appreciate the cooperation and courtesies provided by your staff. If you have any questions or need additional information, please contact Rita Oliver, Director, Delivery, or me at (703) 248-2100.

E-Signed by Robert Batta

Robert J. Batta Deputy Assistant Inspector General for Mission Operations

Attachments

cc: Patrick R. Donahoe William P. Galligan Vice Presidents Area Operations Wayne W. Corey Katherine S. Banks

APPENDIX A: ADDITIONAL INFORMATION

BACKGROUND

The Postal Service uses VMAS to code and track costs. VMAS is a computer-based support system designed to collect, process, store, present, and communicate vehicle maintenance data. The objective of VMAS is to provide a management tool for the effective and efficient operation and maintenance of the Postal Service vehicle fleet by providing timely and accurate cost accounting information on all aspects of fleet operations and maintenance. The Vehicle Maintenance Cost Report in Dollars reflects the total cost for all postal-owned vehicles assigned to a VMF and includes all contract parts, material, and labor.

The Enterprise Data Warehouse (EDW) is a collection of data, including contract repair and maintenance costs paid from Voyager and other sources stored in a single database for reporting and analysis. Contract costs, whether paid with a Voyager Card, Postal Service Form 8230, Authorization for Payment, or a Vehicle Repair Maintenance Agreement are automatically transmitted to EDW when paid. However, contract costs paid with a Voyager Card are not automatically reported in VMAS and must be manually reported by VMF personnel. Vehicle Operations management stated it was not possible to electronically send detailed Voyager commercial repairs cost data to VMAS because of the number of product codes and breakout of parts, labor, vehicle washings, and towing/shuttling; therefore, data must be manually input. Even the new accounting system under consideration to replace VMAS would require a manual input of contract invoice data to ensure all costs are reported.⁵

Headquarters Vehicle Operations implements and monitors national policies, procedures, and systems for VMF operations. They provide areas and districts with policies and procedures, tools and support, and communicate an overall strategic vision. Area and district offices implement policies and provide local guidance for the daily operations, budgeting, and managing of resources at VMFs.

OBJECTIVES, SCOPE, AND METHODOLOGY

Our first objective was to assess the effectiveness of monitoring vehicle maintenance and managing resources. To accomplish this, we reviewed the nine area audits⁶ and identified nationwide issues for improvements in vehicle facility operations applicable to headquarters. We examined the existing VMAS process for tracking maintenance and managing resources and met with headquarters management about the development of their workload requirements model.

⁵ This problem is due to the incompatibility of cost data from the Voyager Card System. We referred the new VMAS issues to the OIG Information Systems Directorate for further review.

⁶ The OIG developed an optimization model that used operational data to establish baseline standards, key characteristics, shuttle usage, and cost. Using this data, we established an optimum operating efficiency for each VMF.

Our second audit objective assessed the completeness of cost data impacting the overall VMF operational environment. To accomplish the objective, we reviewed EDW for all contract repair and maintenance costs, and the General Ledger Account (GLA) 54543, reported by each area and district for FY 2008. We compared the EDW amount of contract repair and maintenance costs (parts and labor) reported for each area and district to the VMAS Cost Report in Dollars for variances in reporting. We judgmentally selected six VMFs in six districts covering five Postal Service areas to review reported data and discuss reporting procedures.

We conducted this audit work from October 2008 through June 2009 in accordance with generally accepted government auditing standards and included tests of internal controls that were considered necessary under the circumstances. Those standards require that we plan and perform the audit to obtain sufficient and appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe the evidence obtained provides a reasonable basis for our findings and conclusions based on data from VMAS and EDW. We did not audit these systems but performed a limited review of data integrity to support our reliance on the data. We discussed our observations and conclusions with management officials on April 29, 2009 and included their comments where appropriate.

PRIOR AUDIT COVERAGE

We issued nine reports assessing whether VMFs accomplished all required scheduled maintenance and integrated VMFs and local commercial resources for optimum efficiency. The audit reports showed that VMFs did not always complete all scheduled maintenances and could optimize VMF efficiency through the more effective use of VMF and local commercial resources. Management agreed with our findings and recommendations and generally agreed with the monetary impact on our prior reports.

	Report Title	Report Number	Final Report Date	Monetary Impact
1	VMFs – Scheduled Maintenance in the Eastern Area	DR-AR-09-005	April 23, 2009	\$10,898,100
2	VMFs – Scheduled Maintenance Service in the Capital Metro Area	DR-AR-09-003	January 27, 2009	\$17,951,396
3	VMFs – Scheduled Maintenance Service in the Northeast Area	DR-AR-09-001	December 9, 2008	\$14,817,650
4	VMFs – Scheduled Maintenance Service in the New York Metro Area	DR-AR-08-011	September 30, 2008	\$25,287,093
5	VMFs – Scheduled Maintenance Service in the Pacific Area	DR-AR-08-010	September 30, 2008	\$21,580,236
6	VMFs – Scheduled Maintenance Service in the Great Lakes Area	DR-AR-08-009	September 29, 2008	\$28,224,843

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	Report Title	Report Number	Final Report Date	Monetary Impact
7	VMFs – Scheduled Maintenance Service in the Western Area	DR-AR-08-008	September 29, 2008	\$14,251,384
8	VMFs – Scheduled Maintenance Service in the Southeast Area	DR-AR-08-007	September 16, 2008	\$27,620,773
9	VMFs – Scheduled Maintenance Service in the Southwest Area	DR-AR-08-006	August 14, 2008	\$34,522,159

APPENDIX B: DETAILED ANALYSIS

Although VMF management effectively completed the majority of required scheduled maintenances, additional improvement was necessary. Specifically, improved monitoring of VMF operations and managing of resources could ensure all maintenance is tracked for completion, resources optimized, and all costs reported in VMAS.

Monitoring Operations and Managing of Resources

Our analysis of the nine area audit reports revealed the Postal Service could not readily track vehicles with completed scheduled maintenance in VMAS. The process was to track maintenance-in-arrears rather than scheduled maintenance completed. Maintenance-in-arrears are indications of vehicles with scheduled maintenances not completed; however, any adjustment to the schedule results in removing maintenance-in-arrears status from the system. Additionally, VMF units did not have a process to optimize the available VMF and local commercial vendor resources. Specifically, the vehicle maintenance plan did not consider an optimum combination of both VMF and commercial resources. For example, VMF unit officials often used local commercial vendors for vehicle maintenance and repairs when using VMF resources would have been more efficient and economical and vice versa. Finally, VMF officials used VMF employees to shuttle vehicles from the VPO to the VMF when more economical means existed. Likewise, Headquarters Vehicle Operations did not have a process to optimize resources as well. See Tables 1, 2, and 3 for maintenances completed, use of resources, and vehicle maintenance technician shuttling hours.

Completing all required scheduled maintenance reduces the likelihood of vehicle breakdown and vehicle safety problems. Effective use of VMF and local commercial resources reduce the Postal Service's overall maintenance cost. The Postal Service is currently evaluating a system as a potential replacement for VMAS. Management stated any new system obtained to replace VMAS would have the capability to easily track completed maintenances and not rely on tracking maintenance-in-arrears.

The Postal Service developed Handbook PO-701, *Fleet Management*, to assist operating personnel in maintaining the vehicle fleet in the most economical manner possible. The handbook requires a maintenance plan that provides for regular examination and service of Postal Service-owned vehicles. VMF managers must prepare a vehicle maintenance plan designating where and when each vehicle will receive scheduled maintenance.

Headquarters Vehicle Operations began developing a Vehicle Operations Workload Criteria Model to improve efficiency. Vehicle operations management stated the intent of their model is to provide data to support annual budget requests, a cost analysis of commercial and in-house repair scenarios, and a standardized workload projection for VMFs to use in evaluating their maintenance program efficiency. The model will be tested during FY 2009 and with plans to become operational in FY 2010.

Area	Required in FY 2007	Performed	Percentage Performed
Capital Metro	16,406	15,380	94
Eastern	9,357	8,901	96
Great Lakes	15,912	14,324	90
New York Metro	25,753	23,826	93
Northeast	14,776	14,483	98
Pacific	38,285	38,118	99
Southeast	25,131	23,953	95
Southwest	27,604	21,710	79
Western	27,675	27,336	99
Total/Average	200,899	188,031	94

Table 1: Scheduled Preventive Maintenance (SPM) Performed for Sampled VMFs

Sources: VMAS data and OIG optimization model.

	SPMs Performed by			SPMs Performed Inefficiently by		Total Inefficiently
Area	VMF	Local Vendors	Total SPMs Performed ⁷	VMF	Local Vendors	Performed SPMs
Capital Metro	13,049	2,368	15,380	1,980	322	2,302
Eastern	7,011	1,890	8,901	992	235	1,227
Great Lakes	10,970	3,354	14,324	690	1,893	2,583
New York Metro	13,922	9,904	23,826	4,204	807	5,011
Northeast	14,094	465	14,483	87	1,668	1,755
Pacific	36,174	1,944	38,118	880	657	1,537 ⁸
Southeast	17,395	6,558	23,953	1,183	3,704	4,887
Southwest	18,251	3,365	21,616	436	1,538	1,974
Western	23,501	3,835	27,336	310	244	554
Total	154,367	33,683	187,937	10,762	11,068	21,830

Sources: VMAS data and OIG optimization model.

⁷ VMAS does not track the number of SPMs accomplished. The OIG's efficiency and optimization model estimated the number completed by analyzing all work orders assigned to code 22 (scheduled maintenance) and, with some adjustment, considered all work of at least 2 hours as an SPM. ⁸ Eighty-one percent of the 1,537 SPMs were attributed to one VMF.

VMF Location	Number of Vehicle Maintenance Technicians Assigned	Estimated Scheduled Maintenance Hours Available	Total Shuttle Hours Used in FY 2007	Percentage of Direct Maintenance Hours Used for Shuttling	Shuttle Hours Used for Scheduled Maintenance	Equivalent Maintenance Technician Positions	Cost of Shuttle Hours Used by Maintenance Technicians
Capital Metro	145	203,464	31,224	15	14,357	8	\$617,925
Eastern	77	108,046	13,602	13	7,260	4	312,462
Great Lakes	120	168,384	22,970	14	15,631	9	672,750
New York Metro	211	303,497	23,358	8	11,785	6	507,239
Northeast	134	185,222	17,538	9	13,083	7	563,092
Pacific	278	390,089	67,916	17	28,632	16	1,232,320
Southeast	178	249,770	29,186	12	13,469	8	579,723
Southwest	217	304,494	49,711	16	16,854	10	725,336
Western	204	286,254	45,415	16	19,038	11	819,396
Total/Averages	1,564	2,199,220	300,920	14	140,109	79	\$6,030,243

Table 3: Vehicle Maintenance Technician Hours Used for Shuttling – FY 2007

Sources: VMAS and OIG optimization model.

Maintenance Cost Reporting In VMAS

All costs associated with the maintenance and repair of vehicles were not included in the VMAS. In our nationwide review of all VMFs, we found that \$40,505,382 in vehicle maintenance contract costs were not reported in VMAS. These costs accounted for more than 31 percent of the \$130 million in contract vehicle repair and maintenance cost and more than 6 percent of \$617 million in total vehicle repair and maintenance costs during FY 2008.

This occurred because the Postal Service does not have an effective process for ensuring VMF management always received and inputted all vehicle maintenance contract costs into the VMAS. Specifically,

- Some VMFs had procedures in place to obtain contract invoices from vendors and VPOs; however, they did not always input the invoices into VMAS.
- In other situations, VPOs did not submit the required invoice for work performed by contractors.

All costs associated with vehicle maintenance and repairs are necessary to ensure appropriate fleet decisions. A lack of complete vehicle costs can impact Decision Analysis Report projections and Equipment Maintenance Allowance vehicle cost comparisons. For example, VMAS cost data is relied upon to determine whether the cost to maintain and operate a postal-owned vehicle is less expensive than the amount paid for allowance for a carrier-provided vehicle. Incomplete VMAS cost data could result in decisions that might not be the most cost effective. See Table 4 for unreported contract costs by area. These costs comprise the unrecoverable unsupported questioned costs in the audit. See Appendix C for unreported contract costs by district.

Area	Costs Reported Costs Reported Costs		Contract Repair Costs Not Reported in VMAS
Capital Metro	\$11,074,796	\$6,768,414	\$4,306,382
Eastern	21,131,134	14,856,857	6,274,277
Great Lakes	24,177,956	21,200,744	2,977,212
New York Metro	21,455,130	14,861,402	6,593,728
Northeast	19,303,430	14,227,746	5,075,684
Pacific	15,611,088	11,006,263	4,604,825
Southeast	25,813,467	21,272,611	4,540,856
Southwest	14,033,248	11,189,878	2,843,370
Western	18,145,212	14,856,164	3,289,048
Total	\$170,745,461	\$130,240,079	\$40,505,382

Table 4: Unreported Contract Repair Costs by Area – FY 2008

Sources: Costs obtained from EDW for GLA 54543 and VMAS Cost in Dollars Report.

APPENDIX C: UNREPORTED CONTRACT COSTS BY DISTRICT - FY 2008

Area	District	Contract Repair & Maintenance Costs in EDW	Contract Repair & Maintenance Costs in VMAS	Contract Repair Costs Not Reported in VMAS
Capital Metro	Baltimore	\$4,255,378	\$1,846,035	\$2,409,343
	Capital	1,873,916	1,309,190	564,726
	Greater South Carolina	1,387,062	1,049,098	337,964
	Greensboro	321,249	245,300	75,949
	Mid-Carolinas	546,458	108,674	437,784
	Northern Virginia	1,842,150	1,628,868	213,282
	Richmond	848,583	581,249	267,334
Eastern	Appalachian	627,237	431,160	196,077
	Central Pennsylvania	1,638,138	1,215,264	422,874
	Cincinnati	4,200,982	3,462,203	738,779
	Columbus	957,557	364,894	592,663
	Erie	840,143	560,006	280,137
	Kentuckiana	649,911	412,252	237,659
	Northern Ohio	2,247,273	1,557,067	690,206
	Philadelphia	5,371,341	3,999,810	1,371,531
	Pittsburgh	1,048,539	483,777	564,762
	South Jersey	3,550,013	2,370,424	1,179,589
Great Lakes	Central Illinois	1,910,993	1,656,901	254,092
	Chicago	4,245,693	3,138,480	1,107,213
	Detroit	3,717,018	3,402,016	315,002
	Gateway	1,734,979	1,480,222	254,757
	Greater Indiana	959,158	883,042	76,116
	Greater Michigan	1,117,862	1,039,049	78,813
	Lakeland	4,021,888	3,604,579	417,309
	Northern Illinois	3,209,400	2,986,767	222,633
	Southeast Michigan	3,260,965	3,009,688	251,277
New York	Caribbean	1,905,299	531,467	1,373,832
Metro	Central New Jersey	2,805,997	2,029,979	776,018
	Long Island	4,173,506	3,079,877	1,093,629
	New York	1,447,133	1,133,913	313,220

Area	District	Contract Repair & Maintenance Costs in EDW	Contract Repair & Maintenance Costs in VMAS	Contract Repair Costs Not Reported in VMAS
New York	Northern New Jersey	\$6,134,930	\$4,700,464	\$1,434,466
Metro	Triboro	1,087,303	888,597	198,706
	Westchester	3,900,962	2,497,105	1,403,857
Northeast	Albany	1,506,758	1,229,402	277,356
	Boston	1,430,937	906,296	524,641
	Connecticut	2,510,928	1,316,676	1,194,252
	Maine	537,252	391,206	146,046
	Massachusetts	4,868,675	3,690,845	1,177,830
	New Hampshire/Vermont	1,844,659	1,461,366	383,293
	Southeast New England	4,122,014	3,501,049	620,965
	Western New York	2,482,206	1,730,906	751,300
Pacific	Bay Valley	1,578,341	1,161,597	416,744
	Honolulu	818,838	606,093	212,745
	Los Angeles	1,710,617	585,282	1,125,335
	Sacramento	1,724,094	1,063,422	660,672
	San Diego	3,791,882	3,224,181	567,701
	San Francisco	2,635,153	2,141,986	493,167
	Santa Ana	2,046,518	1,504,308	542,210
	Sierra-Coastal	1,305,647	719,394	586,253
Southeast	Alabama	1,668,130	1,190,262	477,868
	Atlanta	2,632,567	2,299,162	333,405
	Central Florida	3,717,032	2,562,340	1,154,692
	Mississippi	853,579	251,661	601,918
	North Florida	1,481,584	1,096,222	385,362
	South Florida	8,867,638	8,735,476	132,162
	South Georgia	1,153,471	897,228	256,243
	Suncoast	3,216,044	2,723,232	492,812
	Tennessee	2,223,421	1,517,028	706,393
Southwest	Albuquerque	1,184,218	904,889	279,329
	Arkansas	528,082	358,070	170,012
	Dallas	1,120,655	833,746	286,909

Area	District	Contract Repair & Maintenance Costs in EDW	Contract Repair & Maintenance Costs in VMAS	Contract Repair Costs Not Reported in VMAS
Southwest	Fort Worth	\$929,390	\$781,563	\$147,827
	Houston	2,668,883	1,693,827	975,056
	Louisiana	1,743,346	1,372,240	371,106
	Oklahoma	2,789,444	2,677,756	111,688
	Rio Grande	3,069,229	2,567,787	501,442
Western	Alaska	248,137	223,453	24,684
	Arizona	2,614,457	2,190,068	424,389
	Big Sky	650,050	633,801	16,249
	Central Plains	1,353,750	1,046,910	306,840
	Colorado/Wyoming	2,357,695	1,976,292	381,403
	Dakotas	970,175	911,846	58,329
	Hawkeye	979,462	815,546	163,916
	Mid-America	1,642,521	1,411,027	231,494
	Nevada-Sierra	404,074	182,637	221,437
	Northland	1,131,750	933,295	198,455
	Portland	1,171,012	870,960	300,052
	Salt Lake City	1,089,596	765,326	324,270
	Seattle	3,089,576	2,589,847	499,729
	Spokane	442,958	305,156	137,802
Total		\$170,745,461	\$130,240,079	\$40,505,382

APPENDIX D. MANAGEMENT'S COMMENTS

LINDA J. WELCH AVVICE PRESIDENT, DELIVERY AND POST OFFICE OPERATIONS



June 22, 2009

LUCINE M. WILLIS DIRECTOR, AUDIT OPERATIONS

SUBJECT: Draft Audit Report – Vehicle Maintenance Facilities Scheduled Maintenance – National Capping Report (Report Number DR-AR-09- DRAFT)

The Delivery and Post Office Operations management has reviewed the draft report and agrees with the findings.

Recommendation 1:

Ensure Vehicle Maintenance Accounting System (sic) or its replacement system has the capacity to easily track vehicles with completed maintenances.

Response

The OIG is aware of efforts underway to replace the current Vehicle Management Accounting System (VMAS). It is not practical to invest software development and programming resources into a system with a short service life remaining. Vehicle Operations will continue to pursue maintenance tracking requirements within the Solution for Asset Enterprise Management which is being developed as the potential replacement for VMAS.

Recommendation 2:

Institute a policy discontinuing the practice of adjusting the vehicle maintenance schedules for the sole purpose of eliminating vehicles from the "maintenance not completed" status – maintenance in arrears.

Response

Vehicle Operations will issue a policy to the field addressing when it is appropriate to adjust the maintenance schedule, as well as when it is inappropriate and violates the policy. This will be accomplished by August 2009.

Recommendation 3:

Implement the Vehicle Operations Workload Criteria Model to optimize the utilization of Vehicle Maintenance Facility and commercial resources.

Response

Vehicle Operations has already begun the implementation phase of the Workload Criteria Model. It is scheduled to be completed by August 2009.

Recommendation 4:

Establish an effective process for ensuring vehicle maintenance facility management and vehicle post office management include all contract repair and maintenance costs in the Vehicle Maintenance Accounting System (sic) or its replacement.

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<u>Response</u> Vehicle Operations will issue a comprehensive policy to the field (delivery units and VMFs) addressing all aspects regarding the handling and processing of commercial repair invoices. This will be accomplished by September 2009.

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cc: Mr. Galligan Ms. Oliver Ms. Banks Mr. Corey