

# City Delivery – Street Efficiency Capital District

**Audit Report** 

August 16, 2012



## City Delivery – Street Efficiency Capital District

Report Number DR-AR-12-003

#### **BACKGROUND:**

Delivery operations have the highest fixed cost in the U.S. Postal Service, making up more than 30 percent of its operating expenses. Within the delivery carrier's function, street operations account for almost 265 million workhours that city carriers used in fiscal year 2011.

Street operations is comprised of every duty a carrier performs from the time he or she loads the vehicle, delivers, and collects mail along the route, and returns to the delivery unit to unload the vehicle. Street delivery includes carriers delivering and collecting mail on their assigned routes. The Capital District is in the Capital Metro Area and has 57 units delivering mail on 1,842 routes.

Our objective was to assess the efficiency of city delivery street operations in the Capital District.

#### WHAT THE OIG FOUND:

The Capital District has opportunities for enhanced street delivery efficiency. We determined the Capital District could use about 12 fewer minutes of street time per day on each carrier route, or 110,740 workhours, and save about \$4.5 million annually. Our review of selected delivery units determined that management did not always reinforce Postal Service policies and procedures for supervising city delivery street operations at delivery units, which

allowed for some inefficient delivery practices.

#### WHAT THE OIG RECOMMENDED:

We recommended the manager, Capital District, reduce workhours by 110,740. We also recommended reinforcing policies and procedures for supervising city delivery street operations in delivery units, and eliminating inefficient practices. Further, we recommended the district manager require managers to establish and regularly coordinate, review, and update integrated operating plans to ensure that delivery point sequence mail arrives timely and in route order for easy retrieval by carriers.

Link to review the entire report



August 16, 2012

**MEMORANDUM FOR:** KELVIN L. WILLIAMS

DISTRICT MANAGER, CAPITAL DISTRICT

E-Signed by Robert Batta (2)
VERNEY authenticity with e-Sign

FROM: Robert J. Batta

**Deputy Assistant Inspector General** 

for Mission Operations

**SUBJECT:** Audit Report – City Delivery – Street Efficiency

Capital District (Report Number DR-AR-12-003)

This report presents the results of our audit of city delivery street efficiency in the Capital District (Project Number 12XG018DR000).

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

#### Attachments

cc: Dean J. Granholm David C. Fields

Elizabeth A. Schaefer

Philip F. Knoll

Corporate Audit and Response Management

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#### Introduction

This report presents the results of our audit of the city delivery street<sup>1</sup> efficiency in the Capital District (Project Number 12XG018DR000). We discussed this topic with the vice president, Delivery and Post Office Operations, and agreed to a Value Proposition<sup>2</sup> audit for fiscal year (FY) 2012. Our objective was to assess the efficiency of city delivery street operations in the Capital District. See Appendix A for additional information about this audit. The audit addresses operational risk and is one in a series to be conducted by the U.S. Postal Service Office of Inspector General (OIG).

The U.S. Postal Service faces the most difficult operating period in its 235-year history. Mail volume in FY 2011 declined by another 3 billion pieces to 168 billion, dropping total mail volume to levels not seen since 1992. Since 2007, mail volume has dropped by about 44 billion pieces. In contrast, delivery points have increased by more than 2.3 million since 2008.<sup>3</sup> The Postal Service must improve operational efficiency to reduce costs while facing financial losses from declining mail volume.

#### Conclusion

While efficiency improvements have been made in the past, the Capital District has opportunities for enhanced city street delivery efficiency and reduced workhour costs. We determined the Capital District could use about 12 fewer minutes of street time per day on each carrier route, or 110,700 workhours annually. As a consequence, the Postal Service would save about \$4.5 million annually (see Appendix B).

#### **Street Delivery Efficiency**

The increased focus on efficiency would allow management to reduce carrier street workhours. Our review of 14 randomly<sup>4</sup> selected delivery units determined that management did not always reinforce Postal Service policies and procedures for supervising city delivery street operations at delivery units and eliminate inefficient practices. An increased focus on efficiency could allow management to reduce carrier street workhours. For example, management needs to ensure that:

- There is a consistent supervisory presence on the street.
- Carriers deliver mail using the most efficient habits so as not to incur unnecessarily additional street time.

<sup>1</sup> Street delivery (or street time) is comprised of every duty a carrier performs from the time he or she loads the vehicle, delivers, and collects mail along the route and return to the delivery unit to unload the vehicle.

vehicle, delivers, and collects mail along the route and return to the delivery unit to unload the vehicle.

An agreement between the director, Delivery, and vice president, Delivery and Post Office Operations, on work that will address issues of importance to the Postal Service.

<sup>&</sup>lt;sup>3</sup> City delivery is responsible for 1,097,020 of the 2,390,741 delivery points added from FYs 2007 through 2011.

<sup>4</sup> We obtained a random sample from delivery units having 15 or more routes and 875 or more workhours used than

- Carriers load their delivery vehicles using the more efficient way so as not to increase street time.
- Delivery point sequence (DPS) letters processed at the plant arrive at delivery units staged in route order for easy retrieval by carriers.
- Delivery unit and processing plant management establish, coordinate, and update integrated operating plans<sup>5</sup> (IOPs) for units to receive the proper mail types at scheduled times so carriers do not have to wait on mail before departing for the street and potentially delaying their return to the office.

#### **Street Supervision**

Supervisors did not always provide sufficient oversight of street operations. When asked, several carriers stated they occasionally observed supervisors on the street but not on a regular basis. Some supervisors stated they would like to spend more time observing street operations and correcting inefficient carrier habits, but their duties in the office often prohibited them from performing these duties.

One of the tools used to assist in street supervision is Postal Service (PS) Form 3999, Inspection of Letter Carrier Route, 6 documenting the carrier's ability to perform their route on the street. Supervisors are required to complete a PS Form 3999 at least annually. However, our review indicated that unit management often did not have upto-date PS Forms 3999. In fact, we identified about 33 percent of these forms (for 596 of 1,819 routes) that were more than 1 year old. Having a current PS Form 3999 allows the supervisor to know exactly the carrier's line-of-travel and where a carrier should be and at what time. A current PS Form 3999 also allows the supervisor to know how long a section of deliveries should take and helps monitor street performance.

#### More Efficient Carrier Practices

The OIG observed instances of carriers not using efficient carrier practices while performing street duties at all 14 delivery units. These opportunities include:

- Using satchels to hold mail (see Figure 1).
- Fingering<sup>9</sup> mail between deliveries.
- Making multiple trips to vehicles during delivery stops.

#### Figure 1: Carrier Not Using Satchel

<sup>&</sup>lt;sup>5</sup> The IOP contract covers mail arriving from the plant and identifies the product of mail for each individual trip. The primary purpose is to stabilize mail flow.

<sup>&</sup>lt;sup>6</sup> A route examiner uses PS Form 3999 to record all pertinent information concerning the carrier's office and street performance.

<sup>&</sup>lt;sup>7</sup> Handbook M-39, *Management of Delivery Services*, March 1998, Section 134.11 states that "all carriers are to be notified to expect daily supervision on the street" and ". . . accompanying carriers on the street is an essential responsibility of management."

<sup>&</sup>lt;sup>8</sup> A review of PS Form 3999 at the Capital District that was older than 1 year as of July 6, 2012.

<sup>&</sup>lt;sup>9</sup> The final separation of mail for the next several stops along with the verification of the address for delivery.



Source: OIG, picture taken June 2012.

We observed multiple instances of carriers not using satchels to deliver mail, thereby making multiple trips to and from their vehicles for more mail and incurring additional street time. Inconsistent or improper use of satchels result in carriers having to make more frequent trips to retrieve mail from their vehicles, thus incurring additional street time. Postal Service procedures require carriers delivering mail on park-and-loop routes to use their vehicles as movable relay boxes, <sup>10</sup> from which the carrier withdraws a substantial amount of mail and place it into their satchel before beginning the route. Carriers are required to carry the appropriate amount of mail, up to the 35-pound limit, to complete each assigned relay without additional trips to the vehicle or relay box. <sup>11</sup>

We also observed some carriers not "fingering mail between deliveries to place mailpieces in order to avoid backtracking. A foot carrier routinely performs this task enroute between deliveries, while a motorized carrier performs this task as he walks from the vehicle to a house box. If the delivery is a curb box, the carrier fingers the mail in the vehicle before placing it in the box. In addition, we observed some carriers making multiple trips from the vehicle to deliver mail to cluster box units (CBUs). 12

#### More Efficient Loading Habits

The OIG observed instances of carriers not using efficient loading practices while on street duties at 13 of 14 delivery units. Although we can trace some of the inefficient loading habits to carriers waiting on mail or parcels, we observed opportunities for carriers to be more efficient and save street time while loading delivery vehicles.

For example, we observed time-wasting practices, such as going to personal vehicles (see Figure 2) or carriers rehandling parcels by placing them on the ground before

<sup>10</sup> Bundles or strapped mail the carrier prepares in sacks for delivery to boxes on the carrier's line-of-travel. When the carrier completes delivery of carry-out mail, they may pick up additional mail from relay boxes and continue this process until the entire route is served.

<sup>&</sup>lt;sup>11</sup> Postal Service Handbook M-41, City Delivery Carriers Duties and Responsibilities, Section 273, March 1998.

<sup>&</sup>lt;sup>12</sup> A centralized unit of individually locked mailboxes. CBUs are commonly used in new housing neighborhoods and single buildings that house multiple businesses and are the most efficient means of delivery for the Postal Service.

placing them in the vehicles (see Figure 3). In addition, carriers could become more efficient by not engaging in unnecessary conversations, smoking, or using the telephone.

Figure 2: Carrier Moving Private Owned Vehicle During Loading



Source: OIG, picture taken May 2012.

Figure 3: Carrier with Parcels on the Ground



Source: OIG, picture taken May 2012.

In addition, some carriers made multiple trips to the office, and some units did not supervise loading activities to prevent an expansion of street time. Postal Service policy states that carriers should "avoid extra trips to the vehicle unless absolutely necessary" and "delivery unit managers must supervise loading area activities daily to prevent operational delays."

#### **Delivery Point Sequence Handling**

At all 14 delivery units observed, DPS letters processed by the plant arrived at delivery units in mail transport containers stacked on top of each other and not staged for easy retrieval by the carriers. In most cases, a clerk or the supervisor reorganized the DPS mail; however, carriers unloaded and sorted through the containers to identify their routes' DPS mail while on street time (see Figure 4).



Figure 4: Carrier Rehandling DPS Mail

Source: OIG, picture taken May 2012.

When carriers have to search for their DPS mail trays, this extends their street time by delaying their loading and departure. Postal Service policy<sup>13</sup> states ". . . mail processing should stage DPS letters for transport in shelved or modified containers so individual trays do not have to be rehandled at the delivery unit." In addition, policy<sup>14</sup> states "DPS mail is not to be distributed to carriers, but staged near the exit for transport to vehicles so they can be taken directly to the street without further handling."

<sup>&</sup>lt;sup>13</sup> Field Operations Standardization Development, Morning (AM) Standard Operating Procedures (AMSOP) II Guidebook, 2007, Section 2-6.

<sup>&</sup>lt;sup>14</sup> Field Operations Standardization Development, Morning (AM) Standard Operating Procedures (AMSOP) II Guidebook, 2007, Section 4-5.

#### **Integrated Operating Plan**

Mail did not always arrive in the proper mail mix. We observed several instances in which the majority of flat mail arrived with DPS mail on the last dispatch of the morning. Further, we observed parcels arriving along with DPS mail or arriving later than expected. Contributing to this condition is the fact that each unit visited did not have an IOP. The IOP is designed to help stabilize mail flow and is critical in establishing appropriate staffing and reporting times to ensure carriers are not delayed. Delays can prolong carriers' return time beyond 5 p.m.. <sup>15</sup> The Capital District has daily meetings to report issues to the plant. Although mail arrival has improved, mail flow issues often remain unresolved.

Adjusting its operations and improved supervision during carrier street delivery would increase Capital District's overall efficiency by reducing 110,740 workhours. We estimate this would result in the Postal Service saving more than \$4.5 million annually, or about \$9 million over 2 years (see Appendix B).

#### Recommendations

We recommend the district manager, Capital District:

- 1. Reduce 110,740 workhours to achieve an associated economic impact of \$4.5 million annually, or \$9 million over 2 years.
- 2. Reinforce and ensure adherence to Postal Service policies and procedures for supervising city delivery street operations at delivery units and eliminate carrier inefficient practices during street time.
- 3. Increase street efficiency by preparing the integrated operating plans with facility processing managers and ensure delivery point sequence mail arrives timely and in route order for easy retrieval by carriers.

#### **Management's Comments**

Management agreed with the findings, recommendations, and monetary impact.

In response to recommendation 1, management agreed with the 110,740 in workhour savings. Management has tasked the city delivery offices with performing at 2 percent under the unit's base workhours. Daily service reviews are conducted in offices pursing these targets with findings reported to district senior management. To increase focus on savings, management is performing a daily analysis of city delivery indicators for each

<sup>&</sup>lt;sup>15</sup> The OIG previously reported on the effects of IOP issues on carrier office efficiency and workhours in the report titled *National Assessment of City Delivery Efficiency 2011 – Office Performance* (Report Number DR-MA-11-002, dated July 19, 2011).

route. In subsequent discussions, management stated their plans are ongoing with an estimated completion date of October 1, 2014.

Management responded to the second recommendation by agreeing there are opportunities to save workhours associated with improving street efficiencies. The Capital District plans to use various delivery tools to continue to monitor, communicate, and hold accountable the teams that are not working toward improving those efficiencies. The Capital District has placed emphasis on training all city delivery offices. In addition, the Capital District has focused on increasing the number of PS Form 3999 completions by mandating a fixed number be completed by each manager of Post Office Operations daily. Additionally, beginning August 2012, the PS Form 3999's review process will be scheduled monthly to ensure compliance. Lastly, the Capital District has initiated a new critical process that covers all customer service activities. Postmaster and managers will provide daily certification of more than 60 items related to city carrier operations as well as discussing prior day performance. The critical process is expected to be fully implemented by October 1, 2012.

Management responded to the third recommendation stating their agreement with the finding that IOPs need to be updated as changes are made between the plant and Customer Service Operations. The Capital District stated the district manager of Operations and lead manager of In-Plant Support have been tasked with updating the IOPs. Once updated, quarterly reviews will be established to ensure maintenance of transportation schedules and proper mail flows are maintained. Management stated their plans are ongoing with an estimated completion date of October 1, 2012. See Appendix C for management's comments in their entirety.

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

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

The OIG considers recommendation 1 significant, and therefore requires OIG concurrence before closure. Consequently, the OIG requests written confirmation when corrective actions are completed. 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.

#### **Appendix A: Additional Information**

#### Background

The Postal Service faces the most difficult operating period in its 235-year history. Mail volume in FY 2011 declined by another 3 billion pieces to 168 billion, dropping total mail volume to levels not seen since 1992. Since 2007, mail volume has dropped by about 44 billion pieces. The Postal Service must improve operational efficiency to reduce costs while facing financial losses from declining mail volumes.

Despite a high degree of automation, mail delivery remains labor intensive. Labor costs comprise nearly 80 percent of the Postal Service's cost. Delivery operations have the highest fixed cost in the system, making up more than 30 percent of the Postal Service's operating expenses. Within the delivery carrier's function, street operations made up 264,989,254 of the overall 349,564,154 total office and street workhours <sup>16</sup> city carriers used in FY 2011(more than 76 percent). Street operations (or street time) is comprised of every duty a carrier performs from the time he or she loads the vehicle, delivers and collects mail along the route, and returns to the delivery unit to unload the vehicle. The Capital District is in the Capital Area and has 57 delivery units delivering mail on 1,842 routes and expended about 5.2 million in total workhours from April 1, 2011, through March 31, 2012.

Unlike the carrier office function, a supervisor is not always present to observe each carrier as they conduct deliveries along the route. This leaves opportunity for inefficiency to enter the process. To effectively manage this manual process and improve productivity, delivery supervisors strive to eliminate process inefficiencies and manage costs by accurately matching workload to workhours, adjusting or eliminating unnecessary routes, managing staff resources, and following a rigorous standardization of best practices.

#### Objective, Scope, and Methodology

Our objective was to assess the efficiency of city delivery street operations in the Capital District. To accomplish our objective, we:

- Determined and used Delivery Operations Information System (DOIS) street variance data to access performance and opportunities for efficiency based on discussions with Postal Service officials and OIG experts. Street operations have no preferred measurement of efficiency.
- Reviewed DOIS street variance hours from Enterprise Data Warehouse (EDW) for a 1-year period in the Capital District. The difference between DOIS-projected street hours and the actual street hours used on an individual delivery route or entire unit resulted in the number of variance hours. A positive variance means the delivery unit

<sup>&</sup>lt;sup>16</sup> DOIS workhours queried from the EDW.

used more street hours than DOIS projected, which indicates there is an opportunity for greater efficiency on the street.

- Randomly selected 14 delivery units in the Capital District that used more street hours than projected from April 1, 2011, through March 31, 2012, to determine opportunities for greater efficiency and reduced operating costs. We projected cost savings for delivery units in the Capital District using more actual street hours than projected.
- Reviewed and discussed procedures for street operations with management in selected delivery units. We judgmentally selected individual city routes to review and observed carrier street performance.
- Reviewed documentation and applicable policy and procedures for city delivery and Postal Service Handbooks M-39 and M-41.

We conducted this performance audit from April through August 2012, 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 June 4, 2012, and included their comments where appropriate.

We relied on data obtained from Postal Service database systems, such as DOIS and EDW. We did not directly audit the systems but performed limited data integrity review to support our data reliance. We assessed the reliability of delivery points' data by reviewing existing information about the data and the system that produced them, as well as interviewing agency officials knowledgeable about the data. We determined the data were sufficiently reliable for the purposes of this report.

### Prior Audit Coverage

	Report	Final Report	Monetary	
Report Title  City Delivery Efficiency Review  - San Francisco Napoleon Street Station	Number DR-AR-10-002	<b>Date</b> 12/18/09	\$21,308,433	Report Results  The audit concluded the San Francisco Napoleon Street Station was not operating at peak efficiency and management could reduce city delivery costs. Our
				benchmarking comparison of five similar delivery units showed this station used 54,975 workhours more than necessary. We also found that management did not adjust workhours to changes in workload. Management agreed with our findings and recommendations to correct the issues identified.
City Delivery – Street Efficiency San Diego District	DR-AR-12-001	6/5/12	\$6,840,240	The San Diego District has opportunities for enhanced street delivery efficiency. An increased focus on efficiency could allow management to reduce about 83,930 carrier street workhours. Our review of selected delivery units determined management did not always reinforce Postal Service policies and procedures for supervising city delivery street operations in delivery units, which allowed for some inefficient delivery practices.  Management agreed with our findings and

**Appendix B: Monetary Impact** 

Recommendation	Impact Category	Amount
1	Funds Put to Better Use <sup>17</sup>	\$9,138,265

We estimated the monetary impact of \$9,138,265 in funds put to better use by reducing 110,740 workhours at delivery units in the Capital District (see Table 1).

**Table 1. Capital District Workhour Savings** 

		Estimated	Annual	2-Year
		City	Estimated	Projection of
		Delivery	Savings from	Savings from
	Delivery	Workhours	Overtime	Overtime
District	Units	Saved	Workhours	Workhours
Capital	57	110,740	\$4,528,159	\$9,138,265

Source: OIG.

We calculated funds put to better use for reducing city carrier workhours using the Capital District city carrier overtime rate of \$40.89 for FY 2013, with an escalation factor of 1.5 percent for the 2-year projection.

The 110,740 annual workhour savings represent 6,644,400 minutes (110,740 hours multiplied by 60 minutes). Dividing the more than 6 million minutes by 1,842 routes <sup>18</sup> in the Capital District and then dividing by 303 annual days equals a savings of about 12 minutes per route per day.

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<sup>&</sup>lt;sup>17</sup> Funds that could be used more efficiently by implementing recommended actions.

<sup>&</sup>lt;sup>18</sup> Number of routes in the district as of April 2, 2012.

#### **Appendix C: Management's Comments**



July 31, 2012

LUCINE M. WILLIS DIRECTOR, AUDIT OPERATIONS OFFICE OF THE INSPECTOR GENERAL

SUBJECT: CAPITAL DISTRICT PROJECT NUMBER 12XG018DR000

Thank you for the opportunity to respond to the recommendations from your Capital District City Delivery Audit. The audit team provided a thorough and convincing report based on the reviews conducted. Management agrees with the recommendations made and agrees with the monetary impacts as well.

#### RECOMMENDATION 1

Reduce 110,740 work hours to achieve an associated economic impact of more than \$4.5 million annually or \$9.0 million over 2 years.

#### MANAGEMENT RESPONSE/ ACTION PLAN

We agree with the finding, recommendation and the concept used to determine the monetary impact.

We have tasked the city delivery offices with performing 2% under base work hours. During the audit we have tracked office performance daily. Outliers have been identified and the postmasters/managers, along with their MPOO, report out on actions taken to achieve the target. Daily service reviews are conducted in these offices by a Blitz Team with the findings reported to their postmaster, MSCO and/or MPOO for corrective action. On a daily basis the current days' cased volume is sent to the field. Supervisors are to review the inputs to ensure accuracy and make any necessary corrections in DOIS within the 24-hours allowed for data correction. To increase focus, our analysis of the daily indicators now drills down to the route level. These actions are ongoing. Vital offices that achieve base over a 4-week period will be replaced with another office.

#### TARGET IMPLEMENTATION DATE

10/1/2014

#### RESPONSIBLE OFFICIAL

Manager, Operations Programs Support (Capital District)

900 Brentwood RD NE Washington DC 20066-9997 (202) 636-2210 FAX (202) 636-5301



#### **RECOMMENDATION 2**

Reinforce and ensure adherence to Postal Service policy and procedures for supervising city delivery street operations in delivery units and eliminate carrier inefficient practices during street time.

#### MANAGEMENT RESPONSE/ ACTION PLAN

We agree with the finding and recommendation to reinforce and ensure adherence to Postal Service policies and procedures for supervising city delivery street operations in delivery units and eliminate carrier inefficient practices during street time.

The District is taking action in several areas to promote greater street efficiency. Street supervision is a requirement for every delivery supervisor. It is also required to be conducted daily. We recognize that the timely completion of 3999s has been an ongoing concern. During the audit supervisors were selected for 3999 training. This training was conducted by the Greater South Carolina District and has been adopted by Capital Metro Area Operations. The training puts more emphasis on managerial analysis. This training will be given to all city delivery offices and will be completed by Quarter I, FY 2013. We have increased the number of 3999 completions by mandating a fixed number of 3999s be completed by each MPOO daily. Additionally, beginning August 2012, 3999s will be scheduled monthly to ensure ongoing compliance.

During the audit the district also initiated a new Critical Process which covers all customer service activities, including those related to Finance, Human Resources and Marketing. Postmasters and managers will have to provide daily certification of more than 60 items related to city carrier operations which include strict adherence to the LSS Supervisors' Roadmap, completion of 3999s, discussing prior day performance with carriers and ensuring carriers are following proper street procedures. The process is currently being piloted in 4 offices, one in each MPOO area. Current outstanding 3999s will be completed by the end of FY 2012. The Critical Process is expected to be fully implemented by October 1, 2012.

#### TARGET IMPLEMENTATION DATE

10/1/2012

#### RESPONSIBLE OFFICIAL

Manager, Operations Programs Support (Capital District)



#### **RECOMMENDATION 3**

Require managers to establish and regularly coordinate, review and update integrated operating plans to ensure mail arrives timely and in the right mix so that carriers are not delayed in departing for street delivery.

#### MANAGEMENT RESPONSE/ ACTION PLAN

We agree with the finding and recommendation to establish and regularly coordinate, review and update integrated operating plans to ensure mail arrives timely and in the right mix.

During the audit the Network Optimization changes were implemented. IOPs were not updated to reflect the changes. The District MOPS and the Lead MIPS have been tasked with updating IOPs. Once updated, quarterly reviews will be established to ensure maintenance of transportation schedules and proper mail flows.

#### TARGET IMPLEMENTATION DATE

October 1, 2012.

#### RESPONSIBLE OFFICIAL

Manager, Operations Programs Support (Capital District)

This report and management's response do not contain information that may be exempt from disclosure under the FOIA.

Should you need additional information, please contact me.

Kelvin L. Williams District Manager