



Office of Inspector General | United States Postal Service

RISC Report

Trends in New Delivery Points

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Executive Summary

In fiscal year (FY) 2021, the U.S. Postal Service's delivery network consisted of 163.1 million possible addresses, with more addresses – or delivery points – added every day. To better understand how the Postal Service manages delivery points, the U.S. Postal Service Office of Inspector General (OIG) reviewed Postal Service policies related to setting up new delivery points, the type of delivery available at new addresses, and the removal of delivery points. In addition, the OIG interviewed postal personnel and external stakeholders to learn more about policy implementation. Finally, to understand trends in delivery points, the OIG analyzed delivery point data for FYs 2011 through 2021.

Since FY 2011, the Postal Service added a total of 13.2 million active addresses to the network, averaging 1.3 million per year. In FY 2021, the network grew by 1.9 million delivery points from the year before, more than the total populations of Phoenix or Philadelphia. However, delivery point growth did not occur evenly across the country. The south and west experienced more growth than other parts of the U.S., with some states, such as Utah, Idaho, North Dakota, and Texas, adding delivery points at more than double the national average.

The number of delivery points on carrier routes impacts the Postal Service's ability to set prices. New pricing rules approved by the Postal Regulatory Commission in November 2020 allow the Postal Service to use mail density – or total mail volume divided by the number of delivery points – in its price-setting structure. In August 2021, mail density led to a 4.5 percent price increase for market dominant products. Should these trends persist, further price increases associated with mail density will likely be allowed in the future.

Postal Service policies and procedures guide the life cycle of delivery points, including their addition, maintenance, and removal. Policies for establishing new delivery points outline a localized process involving coordination between local postmasters, district personnel, and real estate developers. Developers work with a Postal Service local growth manager, who reviews building plans and decides on the mode of delivery and location of equipment to be installed by developers. Throughout the process, local postal employees coordinate with Address Management System (AMS) personnel to add new addresses to the database. Carriers can also add new delivery points to their existing routes using edit books,

which are physical books used by carriers to report changes in the status of individual delivery points and play an important role in maintaining their accurate count. Once delivery points are established, carriers use the edit books to record changes, such as noting a vacant residence or converting a newly built home into an active delivery point when a resident moves in.

Postal policies also provide guidance on the removal of delivery points from the AMS database. Due to operational complexities, the Postal Service removes delivery points from AMS only if it is certain that an address will never be active again. According to data provided by the Postal Service, about 4.2 million delivery points were permanently removed between FYs 2011 and 2021. Carriers use edit books to identify addresses for potential deletion. Proposed deletions are approved by a supervisor and sent to AMS for review.

Centralized delivery points increased by 23 percent since FY 2011, driven by growth in cluster box units (CBUs). Curbside delivery points grew eight percent, and other delivery points – which includes door deliveries – remained stable. The Postal Service actively promotes centralized delivery at new addresses because it is less costly to deliver mail to a centralized location than to a curbside or door mailbox. The Postal Service estimated that on city routes in FY 2020, each door delivery point costs \$224 annually, a curbside delivery point costs \$198, a CBU delivery point costs \$141, and a centralized delivery point other than a CBU costs \$100. While CBU and centralized delivery points are less costly, changes in the mail mix are making these cost distinctions less clear. Packages are becoming a larger share of total mail volume, while letter mail decreases. Increasing package volumes may erode some of the cost savings of centralized delivery, as packages that do not fit into a centralized receptacle will need to be delivered to a customer's door.

Our research highlighted opportunities to improve the process for establishing new delivery points. Specifically, clarifying CBU maintenance ownership can help alleviate potential confusion over who is responsible for maintenance and repair. In addition, the Postal Service can establish permanent growth manager positions and standardize delivery point growth management across delivery units and districts. These efforts could help promote consistent application of policies and

help with both internal and external communication. Additionally, continuing to promote centralized delivery in new developments and promoting the installation of mail receptacles with more space for packages could help the Postal Service control delivery costs. Increasing the percentage of centralized delivery points can also help contain the costs of rural carrier pay, who are paid based both on the number and type of delivery points on their routes.

Considering their implications on internal operations, costs, and pricing, as well as on the quality of address data-based products offered to customers, it is important for the Postal Service to accurately track and report on the number of delivery points in its network and ensure proper oversight of delivery point addition, maintenance, and removal.

Observations

Introduction

In FY 2021, the U.S. Postal Service's delivery network consisted of 163.1 million possible delivery points across the United States. Plainly stated, delivery points are individual addresses where customers receive mail.¹ Since FY 2011, the delivery network has constantly grown, adding an average of 1.3 million delivery points each year.² For context, the total number of delivery points includes carrier deliveries on rural, city, and highway contract routes, in addition to PO Boxes. Excluding PO Boxes, which are typically located at post offices and not served by a mail carrier, the Postal Service's delivery network consisted of 143.9 million possible addresses in FY 2021.

The status of delivery points and the mode of delivery at each address are important characteristics assigned to every delivery point. The status of delivery points is categorized in two ways, depending on the specific circumstances of each point. The categories are "possible" (which are comprised of active and inactive delivery points), and "no-stat" (Figure 1).³

- **Possible** delivery points include all active and inactive addresses.
 - **Active** delivery points are occupied addresses or addresses that have been vacant fewer than 90 days either on rural or city routes. Nearly 90 percent of delivery points in the Postal Service's network are active.

- **Inactive** delivery points are eligible to receive mail, but do not actually receive any mail. They can include rural addresses that receive mail at a PO Box instead of a street address (known as a "PO Box throwback"), or city delivery points vacant for more than 90 days.

For a structure with multiple addresses, such as an apartment building, each individual address counts as a possible delivery if it has its own mail receptacle. All possible delivery points on a carrier's route are listed in the route's edit book, which carriers use to document proposed status changes to delivery points.

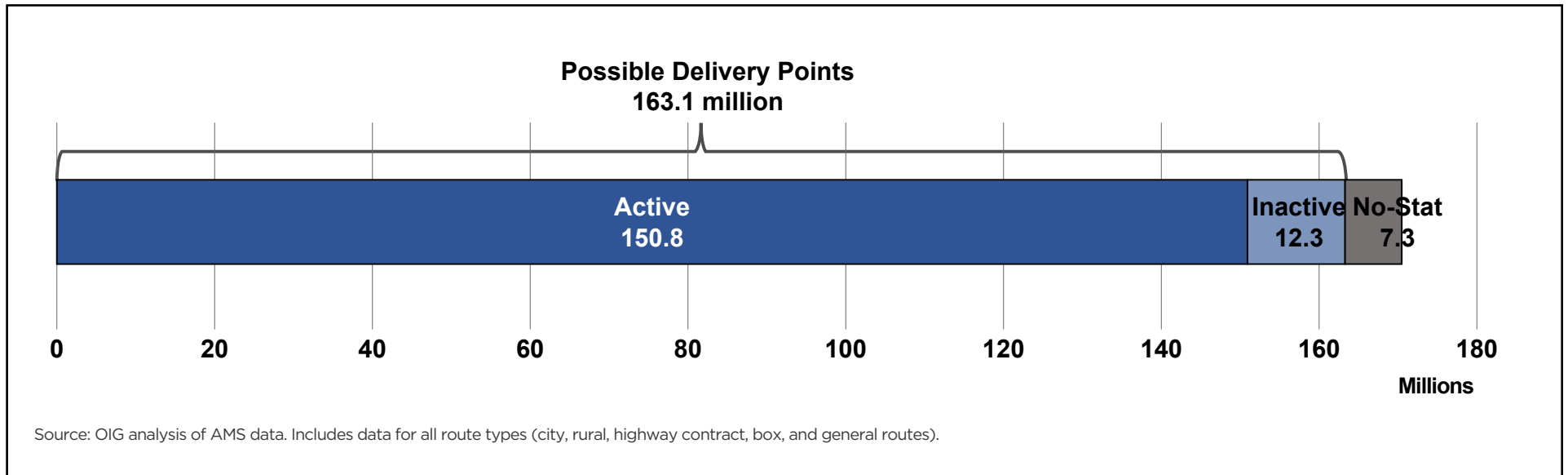
- **No-stat** delivery points are not eligible to receive mail and are not counted as possible delivery points. No-stat delivery points include a broad range of scenarios, such as demolished structures or those under construction. No-stats also includes addresses replaced by another address (for example, if a business in a shopping center expands into the adjacent suite), rural addresses vacant for more than 90 days, addresses that refuse mail delivery, or obsolete addresses flagged for deletion. In FY 2021, no-stat delivery points comprised four percent of all delivery points.

¹ The Postal Service defines a delivery point as: "(1) A single mailbox or other place to which mail is delivered. A street address does not necessarily represent a single delivery point because a street address such as one for an apartment building may have several delivery points. (2) A specific set of digits between 00 and 99 assigned to every address that is combined with the ZIP+4 code to provide a unique identifier for every delivery address." U.S. Postal Service, "Glossary of Postal Terms," https://about.usps.com/publications/pub32/pub32_terms.htm.

² This number reflects the average net growth in the delivery network each year – newly added delivery points minus deleted delivery points.

³ The Postal Service does not have a singular term for delivery points that are possible but not active. In this paper, we use the term "inactive" to refer to these delivery points.

Figure 1: Categorizing Delivery Points, FY 2021



In addition to categorizing the status of each delivery point, the Postal Service classifies delivery points by the type of mailbox at the address – also known as the mode of delivery.⁴ Carriers deliver mail to several different types of mailboxes, with the most common modes of delivery being curbside, centralized delivery, cluster box units (CBUs), and door (Figure 2). In FY 2021, curbside deliveries made up 41 percent of all delivery points. Centralized delivery points, including CBUs, comprised about a third of deliveries, and “other” deliveries – which includes door deliveries – made up one-quarter of all delivery points.⁵

Delivering to every address is part of the Postal Service’s Universal Service Obligation (USO). The USO also dictates the Postal Service deliver mail six days per week but does not mandate how the agency delivers mail. As a result, the Postal Service has flexibility in selecting the mode of delivery. The Postal

Operations Manual (POM) explicitly states the preference for centralized delivery, including CBUs. Centralized delivery is more efficient for letter carriers and has a lower cost per delivery point than other modes of delivery. For FY 2020, the Postal Service estimated each door delivery point on a city route cost \$224, a curbside delivery point cost \$198, a CBU delivery point cost \$141, and a centralized delivery point cost \$100.⁶

To better understand how the Postal Service manages delivery points, to include identifying trends in new delivery points, the U.S. Postal Service Office of Inspector General (OIG) reviewed Postal Service policies for establishing new delivery points, interviewed internal and external stakeholders, and analyzed delivery point data for FYs 2011 through 2021.

⁴ In this paper, we use the term ‘mode of delivery’ which aligns with terminology in the Postal Operations Manual. In other areas of the Postal Service, ‘mode of delivery’ refers to how the mail is delivered, for example, a park-and-loop route.

⁵ Data provided by the Postal Service includes categories for curbside, CBU, centralized, and other delivery modes. The ‘other’ category consists of door, sidewalk, and all other modes of delivery.

⁶ Estimates reflect data for city routes. The Postal Service does not track costs by delivery mode for rural routes.

Figure 2: Modes of Delivery

Curbside Delivery

Curbside deliveries feature mailboxes along the curb that are typically served by a carrier from their vehicle.



Centralized Delivery

Centralized deliveries are groups of mailboxes that a carrier accesses at one time. One example is a mail room in an apartment building.



Door Delivery

Door deliveries feature a door slot or porch mailbox and are served by a carrier on foot.



Cluster Box Unit (CBU)

A CBU is a specific type of centralized delivery featuring a freestanding receptacle with multiple letter slots and typically at least one parcel locker.



Delivery Point Trends

Between FYs 2011 and 2021, the Postal Service's delivery network grew by 13.2 million active delivery points, a 10 percent increase. However, growth did not occur evenly across the country. Southern and western parts of the U.S. grew more rapidly than other areas, and growth on rural postal routes far exceeded city route growth.

To explore delivery point trends, we analyzed active delivery points on rural, city, and highway contract routes as they reflect the actual delivery effort by letter carriers. In FY 2021, 97 percent of possible delivery points on carrier routes were active. Analysis included both residential and business delivery points and excluded PO Box and general routes.⁷

Rapid Growth in Southern and Western States

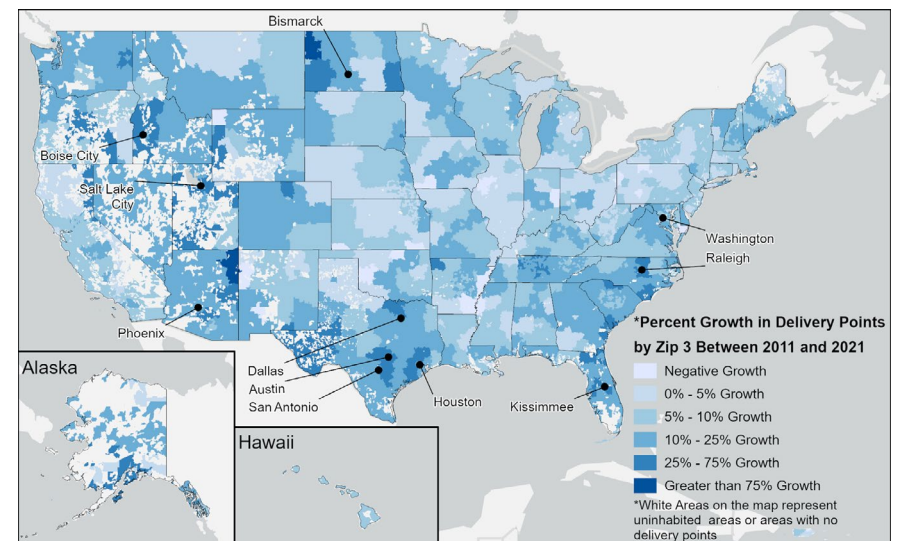
While the greatest number of delivery points were added in populous states like Texas, Florida, and California, the highest rates of delivery point growth occurred throughout the south and west. Delivery points were added in Utah, Idaho, North Dakota, and Texas individually at more than double the national average. Figure 3 illustrates the rate of growth in ZIP3s and Appendix B further details the rate of growth in each state.⁸ The geographic pattern of delivery point growth mirrors data from the 2020 U.S. Census, which demonstrated that the American population continues to urbanize, particularly in the southern and western United States.⁹

No state experienced a decrease in delivery points overall, though some grew more slowly than the national average. States with the lowest rates of growth tended to be in the Northeast or Upper Midwest, including Illinois, Pennsylvania, Connecticut, Ohio, and Michigan, which each grew by five percent, and Rhode Island, which grew by four percent.

Figure 3: Geographic Distribution of Net Change in Delivery Points FY 2011-FY 2021

HIGHER RATES OF GROWTH IN SOUTHERN AND WESTERN U.S.

Between FYs 2011 and 2021, the number of active delivery points in the Postal Service's network grew by 10 percent, though growth did not occur evenly across the country. Growth in states like Texas, North Carolina, Arizona, and Utah outpaced the national average.



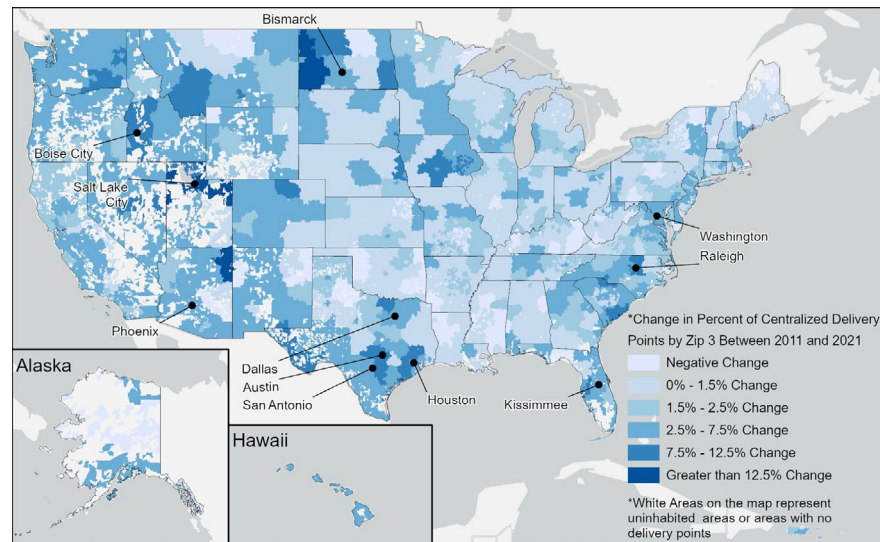
Source: OIG analysis of AMS data.

⁷ According to the Postal Service, general delivery is "mail service for those without a permanent address, often used as a temporary mail address." Post offices hold general delivery mail for customer pickup. U.S. Postal Service, "What is General Delivery?", <https://faq.usps.com/s/article/What-is-General-Delivery>.
⁸ The first three digits of a five-digit ZIP Code (ZIP5) are the ZIP3. ZIP3s correspond to a mail processing facility area.
⁹ U.S. Census Bureau, *2020 Census Statistics Highlight Local Population Changes and Nation's Racial and Ethnic Diversity*, August 12, 2021, <https://www.census.gov/newsroom/press-releases/2021/population-changes-nations-diversity.html>.

Figure 4: Change in Proportion of Centralized Delivery

CENTRALIZED DELIVERY POINTS BECOMING MORE COMMON

Centralized delivery, which includes apartment mailboxes, CBUs, and other delivery points where multiple addresses are served at one location, grew by 23 percent between FYs 2011 and 2021. In addition, centralized delivery points became a larger proportion of all new delivery points, increasing from 56 percent to 68 percent.



Source: OIG analysis of AMS data.

Cluster Box Delivery Growing Faster than Other Modes

In FY 2021, curbside delivery points were the most common type of delivery, comprising 41 percent of all delivery points. However, over the past 10 years, growth in centralized delivery points far outpaced growth in other delivery modes.¹⁰ Centralized delivery points – including apartment mail rooms, CBUs, and other centralized groups of mailboxes - grew 23 percent from FY 2011 to

¹⁰ Since the Postal Service prefers centralized delivery – an umbrella term for any group of multiple mailboxes that includes CBUs – we analyzed the data in two ways. First, we analyzed all centralized delivery points combined (which includes the ‘centralized’ and ‘CBU’ categories). Second, we separately analyzed the data for CBUs.

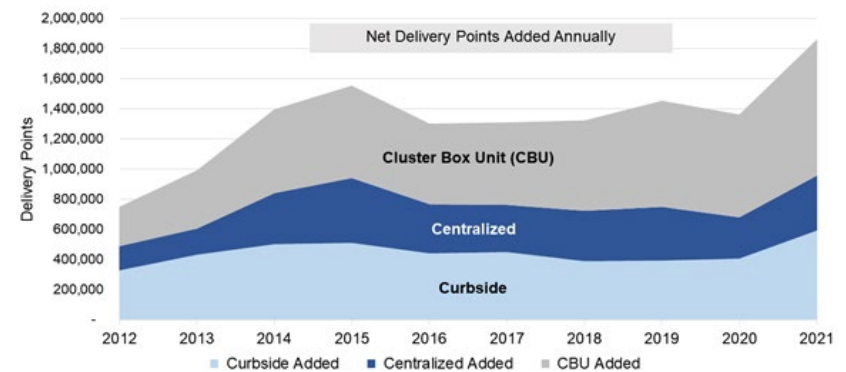
FY 2021 (from 37.8 million to 46.7 million). Centralized delivery points became more common in many areas of the U.S. Nationally, the proportion of centralized delivery points increased from 30 percent of all delivery points to 34 percent, though this varied widely across states. Figure 4 further illustrates the change in the proportion of centralized delivery points nationwide between FYs 2011 and 2021.

CBUs drove much of the growth in centralized delivery, increasing by 34 percent nationally between FYs 2011 and 2021. CBUs increased more than twice as fast as other centralized delivery points (for example, apartment mail rooms) (Figure 5), with the highest rates of growth in North Dakota (102 percent), Iowa (88 percent), Idaho (83 percent), and South Carolina (78 percent).

Figure 5: Centralized Delivery

CBUS DRIVE DELIVERY POINT GROWTH

Between FYs 2011 and 2021, CBU delivery points grew rapidly. Between 2011 and 2012, about a third of new delivery points received CBU delivery, compared to half in 2021. In total, CBU delivery points grew by 5.8 million.



Source: OIG analysis of AMS data.

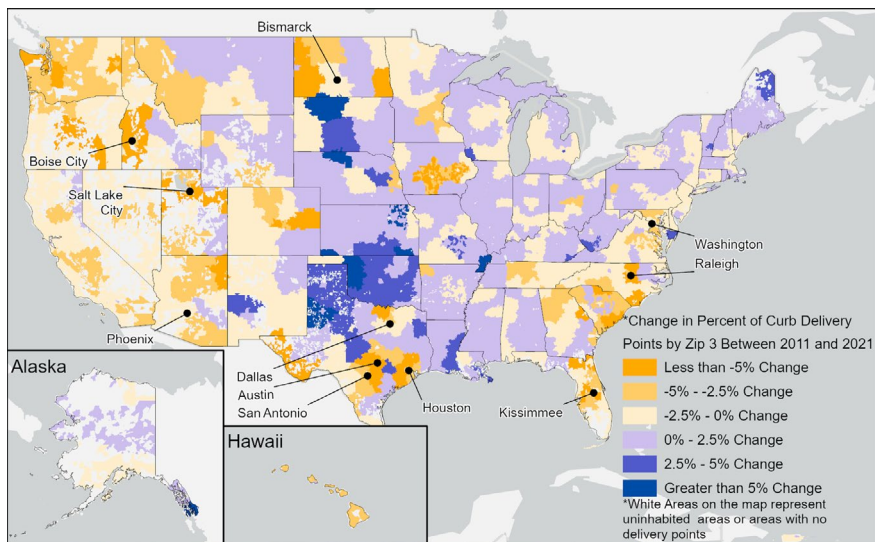
FY 2011 is not shown in the figure because the figure depicts the delivery points added since the previous year.

In contrast to the rapid growth in centralized delivery points, curbside delivery points increased eight percent since FY 2011. Though curbside delivery points grew more slowly than centralized delivery points, the Postal Service still added more than four million curbside delivery points to the network, of which nearly 80 percent were on rural postal routes.

Figure 6: Change in Proportion of Curb Delivery

CURBSIDE DELIVERY POINTS MAKE UP LESS OF THE DELIVERY NETWORK

Between FY 2011 and FY 2021, active curbside delivery points increased from 53.2 million to 57.6 million, though they now make up a smaller proportion of all delivery points. The proportion of curbside delivery points tended to decrease in the south and west.



Source: OIG analysis of AMS data.

Nationally, between FYs 2011 and 2021, the proportion of curbside delivery points decreased slightly from 42 to 41 percent of all delivery points. Curbside delivery points tended to increase in more rural parts of the country and decrease in more urban or high-growth areas (Figure 6).

Lastly, “other” delivery points, which are primarily door and sidewalk deliveries, remained nearly unchanged since FY 2011. In both FY 2011 and FY 2021, about 35 million addresses in the U.S. received mail in these ways. Due to growth in other delivery modes, the overall proportion of door and sidewalk delivery points decreased. The stability in the number of door and sidewalk delivery points since FY 2011 aligns with the Postal Service’s policy to not approve these types of delivery points except in rare circumstances. However, despite the strong discouragement of new door delivery points, ‘other’ delivery points increased in 21 states and the District of Columbia over the past decade. Other delivery modes decreased in 29 states, possibly due to efforts to convert these costly delivery points to more efficient modes.

Most Delivery Points are on City Routes but Rural Delivery Points Are Growing More Quickly

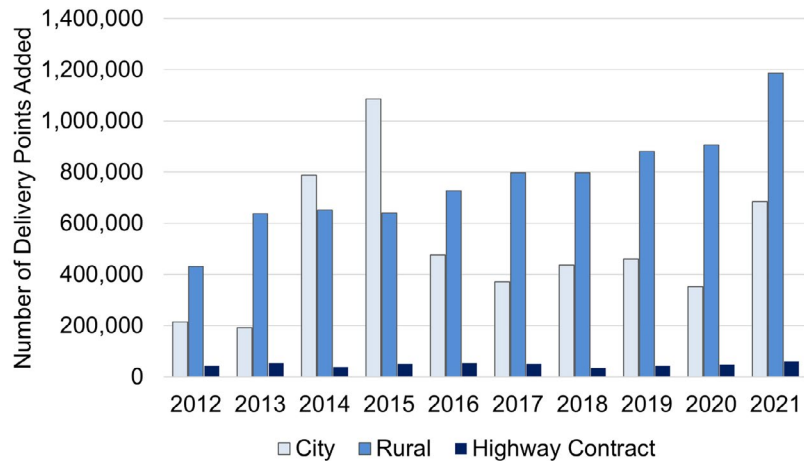
In FY 2021, delivery points on city postal routes made up 63 percent of all delivery points, while delivery points on rural routes made up 35 percent,¹¹ and highway contract routes made up the remaining two percent. Despite increasing urbanization and declines in rural populations nationwide, since FY 2011 growth in rural route delivery points far surpassed growth on city routes. Rural delivery points grew by 19 percent, or 7.7 million delivery points. In contrast, city routes grew by just six percent, or 5.1 million delivery points (Figure 7).¹² The disparity between increasing urbanization and rapid growth in the rural delivery network may be due to the classification of delivery routes as either “city” or “rural” not always aligning with the current delivery conditions of an area.¹³

11 The Postal Service classifies postal routes as either “rural” or “city” routes, which are served by either rural or city letter carriers. Rural and city carriers are paid differently and follow different policies and procedures for delivering mail.
 12 In addition to rural and city postal routes, the Postal Service contracts out mail transportation and delivery on certain routes. Delivery points on these routes grew by 18 percent since FY 2011.
 13 U.S. Postal Service Office of Inspector General, *Package Delivery in Rural and Dense Urban Areas*, Report Number RISC-WP-20-008, September 16, 2020, <https://www.uspsoidg.gov/sites/default/files/document-library-files/2020/RISC-WP-20-008.pdf>, p. 7.

Figure 7: Growth on Rural and City Delivery Routes

RURAL ROUTES GROWING FASTER THAN CITY ROUTES

Rural routes grew three times faster than city routes, adding 7.7 million delivery points over the last decade, compared to 5.1 million on city routes. In eight of the past 10 years, new delivery points on rural routes far exceeded those on city routes.



Source: OIG analysis of AMS data.

Suburban Areas Growing More than Very Rural or Very Urban Areas

Though the Postal Service categorizes carrier routes as “rural” or “city,” these classifications may not always reflect the actual level of urbanization of an area. Previously undeveloped or low-density areas on rural routes became suburban streets lined with single family homes. However, these neighborhoods are often still served by a rural carrier. To better understand trends in delivery points in different parts of the country, we segmented the country into six categories reflecting an area’s level of urbanization: very rural, rural, pre-suburban,

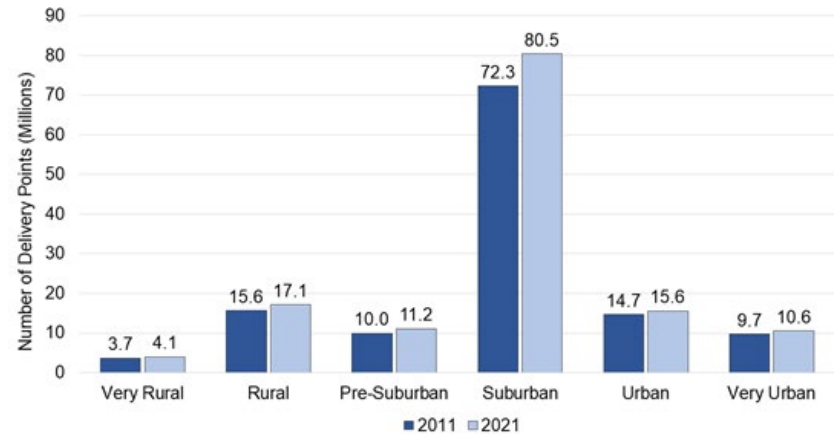
suburban, urban, and very urban. Population density was used to classify geographic areas. A full explanation of our methodology is located in [Appendix A](#).

Of the 13.2 million delivery points added since FY 2011, 8.2 million – or 62 percent – were in suburban areas (Figure 8). Pre-suburban and suburban areas led the country in the rate of growth, at 12 percent and 11 percent, respectively. The slowest rate of growth occurred in urban areas, at 6 percent.

Figure 8: Delivery Point Growth by Level of Urbanization

MOST NEW DELIVERY POINTS ARE IN SUBURBAN AREAS

Of the 13.2 million delivery points added between FYs 2011 and 2021, more than eight million – or 62 percent – were in suburban areas. The highest rate of growth occurred in pre-suburban areas (12 percent) and suburban areas (11 percent), while urban areas saw the lowest rate of growth (six percent).



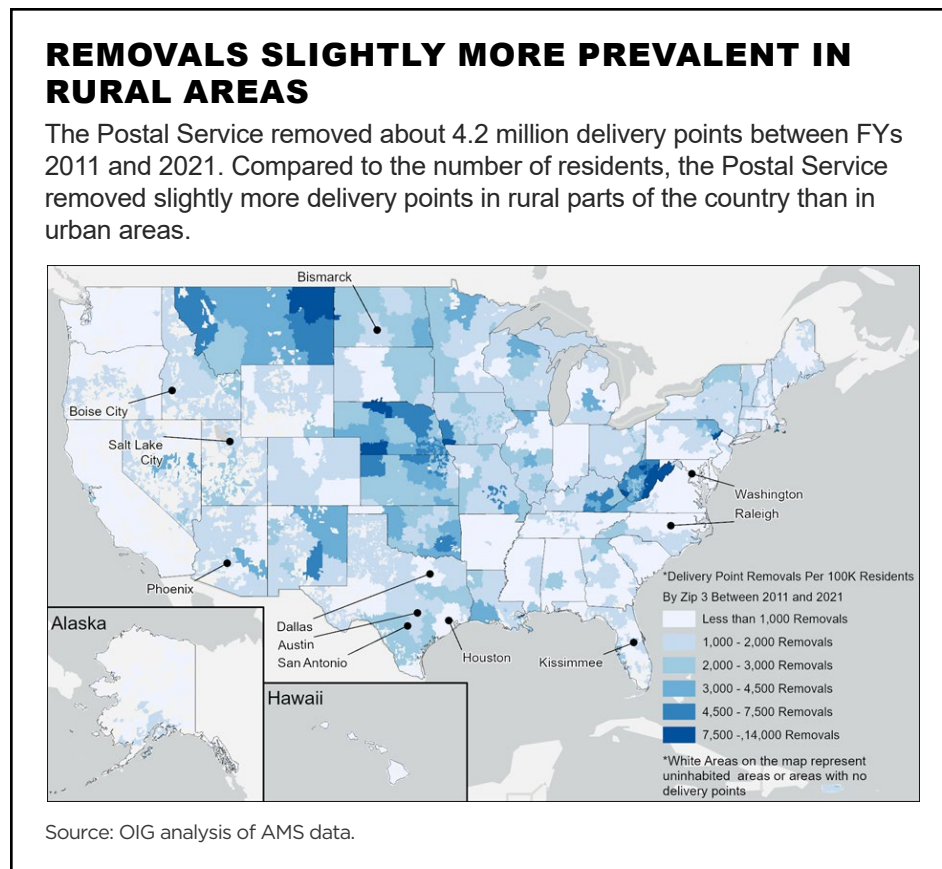
Source: OIG analysis of AMS data.

Permanently Removed Delivery Points

The Postal Service permanently removes delivery points when there is certainty that the address will never be valid again. The number of delivery points removed from the AMS database is not tracked. Postal Service management indicated the

purpose of AMS is to track delivery point addresses for mail delivery purposes, and there is not a business reason to track addresses that are no longer valid. Data provided by the Postal Service showed that between FYs 2011 and 2021, the Postal Service deleted a total of 4.2 million delivery points in the 50 states, D.C., and U.S. territories from the AMS database, with an average of about 380,000 removed annually (Figure 9).¹⁴

Figure 9: Removed Delivery Points



Transparency of Delivery Point Statistics

Every year, in its annual report, the Postal Service publicly reports on the total number of possible delivery points it serves, and the net change from the previous year. The annual net change includes newly added delivery points, and delivery points that already exist but changed status. The formula to calculate the net change is:

$$\begin{aligned}
 &+ \text{Newly added delivery points} \\
 &+ \text{No-stat to possible delivery points} \\
 &- \text{Possible to no-stat delivery points} \\
 &= \text{Net change in possible delivery points}
 \end{aligned}$$

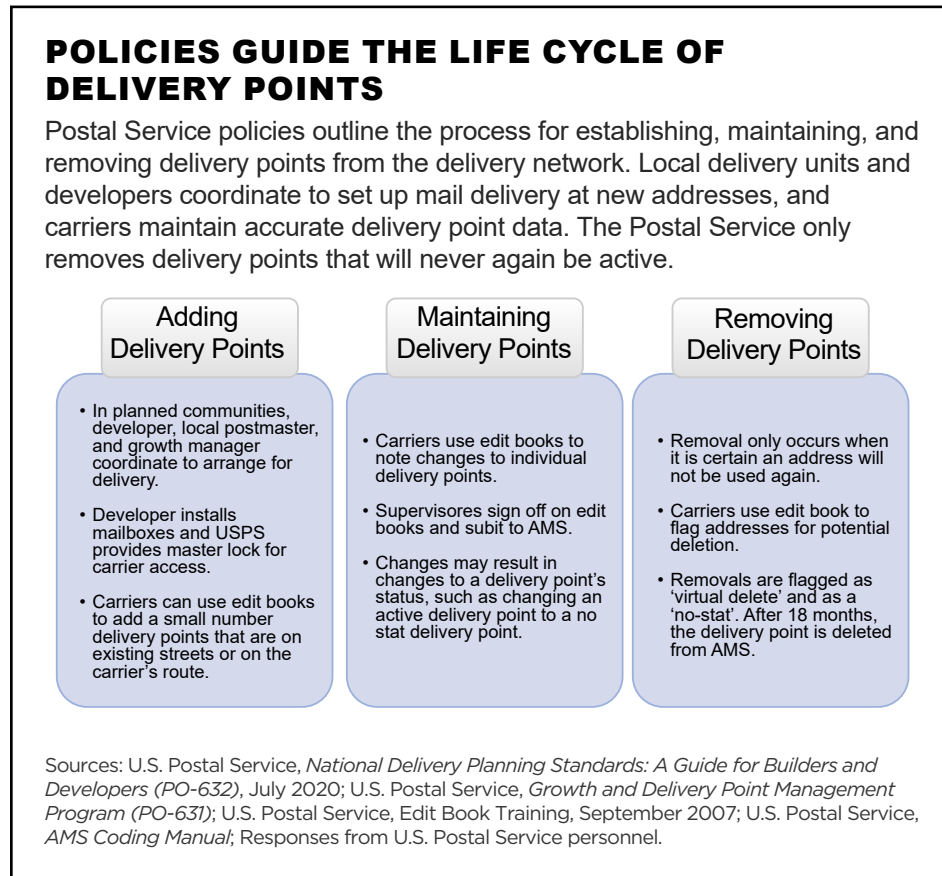
The Postal Service collects data on the status and status change of every delivery point; however, public reporting only includes the total number of possible delivery points. This reporting does not include the count of newly added delivery points, or the number of delivery points that moved between the possible, active, and no-stat categories. In addition, the Postal Service does not track data on the number of delivery points permanently removed from the network, though it has the capability to do so. As the number of delivery points is a key factor considered in setting market dominant product pricing, the Postal Service should provide sufficient transparency on the methodology to calculate the number of delivery points in its network.

How the Postal Service Adds, Maintains, and Removes Delivery Points

The Postal Service has formal policies to guide the establishment, maintenance, and removal of delivery points from its network. The entire process is localized and involves coordination between letter carriers, postmasters, developers, and AMS offices. Figure 10 outlines the elements of each step.

¹⁴ According to the Postal Service, AMS field offices are directed to flag any obsolete addresses as a 'Virtual Delete'. Flagging an address as a 'Virtual Delete' starts an 18-month clock, after which the address is permanently deleted. In addition, flagging an address as a 'Virtual Delete' also categorizes that address as a 'no-stat'.

Figure 10: Delivery Point Life Cycle



Adding New Delivery Points

The addition of new delivery points occurs either through coordination between a developer and a local delivery unit or via carrier initiation. The carrier's initiation of adding a delivery point is facilitated through notations in their edit book. To help guide collaboration with developers, a Postal Service handbook describes the process for setting up new delivery points.¹⁵ In planned communities,

¹⁵ The handbook, PO-632 *U.S. Postal Service National Delivery Planning Standards: A Guide for Builders and Developers*, is available on the Postal Service website. U.S. Postal Service, *U.S. Postal Service National Delivery Planning Standards: A Guide for Builders and Developers*, July 2020, <https://about.usps.com/handbooks/po632.pdf>.

¹⁶ The Postal Service outlines three levels to the appeal process, with each level having 30 days to respond to the developer or builder. The first level of appeal is to the district level, the second level of appeal is to the area manager of delivery programs support (MDPS), and the third and final level of appeal is to the area vice president.

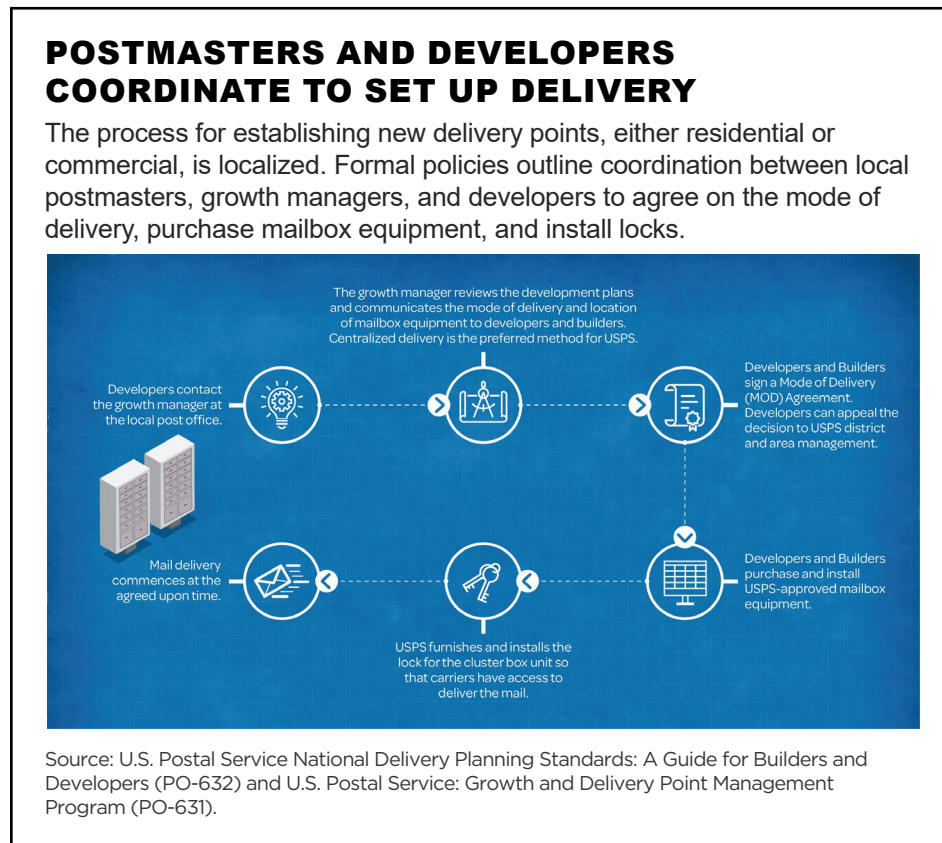
such as apartment buildings or subdivisions, the process should start before construction begins at a new development site. Developers and builders must communicate and coordinate with the Postal Service during their design and planning phase to set up mail delivery at new addresses. A developer should initiate the process by reaching out to their local post office to communicate plans of new construction. The post office then connects the developer with the local postal employee responsible for planning mail delivery service, known as a growth manager. The growth manager is typically the local postmaster, though it could be another person at the delivery unit or someone in a district-level office. The local growth manager is generally supported by a growth coordinator at the district level. Figure 11 presents a high-level overview of how developers and the Postal Service coordinate to establish new delivery points.

Next, the developer submits development plans and a plat map to the growth manager for review – to include a decision on the mode of delivery and location of mailbox equipment. The growth manager communicates the approved type and location of delivery equipment to the developer, and a Mode of Delivery (MOD) agreement is executed. If the developer does not agree with the decision, there is an appeal process.¹⁶ If there is agreement, the developer then purchases and installs the delivery equipment in the assigned location. After mailbox installation is complete, the Postal Service installs a master lock that gives carriers access to centralized mailboxes. Throughout the construction and installation process, the local postmaster or growth manager coordinates with AMS to add new addresses to the system. Addresses for an entire development or phase of a development are added to AMS all at once. For example, addresses for an entire apartment building or for the first phase of a single-family home subdivision would be added to AMS simultaneously.

Delivery points can also be added through manual entries identified within a carrier's edit book. Edit books are physical books used to track every delivery point on a carrier's route. To add a new delivery point, a carrier writes the complete address, the delivery type code, and any additional information in the

edit book, which is then submitted to the district AMS office. If the address is not yet receiving mail delivery, the carrier should identify the delivery point as a no-stat. When delivery begins, the carrier should mark the delivery point as active in the edit book. According to postal personnel we interviewed, adding delivery points using the edit book is typically used for new addresses on existing streets and on the carrier's existing route. Addresses added through edit book changes are added to AMS as they are received.

Figure 11: Process for Establishing New Delivery Points



The Postal Service Prefers Centralized Delivery

The Postal Service actively promotes centralized delivery for new delivery points. Over time, the agency increasingly favored centralized delivery and codified this preference in 2018 revisions to the POM.¹⁷ The policy revisions state that curbside, sidewalk, and door delivery are generally not available for new delivery points and only in very rare exceptions will the Postal Service approve these types of delivery. As a result, developers and builders must plan during their design phase to install centralized mail delivery equipment. Centralized delivery is more efficient and less costly than other modes of delivery; therefore, there are limited exceptions to planning for centralized delivery. One example of such an exception is that new homes built within a block of existing homes will receive the same mode of delivery as the already existing homes.¹⁸

“Centralized delivery is the preferred mode of delivery for all new residential and commercial developments. Curbside, sidewalk delivery, and door modes are generally not available for new delivery points” – POM 631.1

Opportunities to Improve Delivery Point Addition Processes

We interviewed Postal Service personnel and developers in different parts of the country to better understand how they implement written policies for setting up new delivery points. The testimonial evidence found that overall, postal personnel indicate that policies are generally followed, especially those around establishing centralized delivery. One postmaster estimated that new delivery points are “probably 99 percent CBUs.” Another postmaster noted that if AMS receives plans for new curbside deliveries, district-level management will ask for an explanation and request to stop the curbside installation. It is important for postmasters to install centralized delivery whenever possible. If curbside delivery is installed at a residence, the Postal Service has one year to change it to centralized delivery. Otherwise, the curbside mailbox remains in place.¹⁹

17 Prior to the 2018 revisions, USPS updated its policies on delivery services and modes of delivery in 2012 and 2015. The 2012 revisions provide USPS the autonomy to determine the mode of delivery for new delivery points and the 2015 revisions clarified the mode of delivery approval requirements, among other items.
 18 For example, if a new home is built within a block of homes receiving curbside mail delivery, the new home will receive curbside delivery.
 19 U.S. Postal Service, *Postal Operations Manual*, <https://www.nalco.org/workplace-issues/resources/body/Postal-Operations-Manual-POM-Issue-9-July-2002-Updated-With-Revisions-Through-January-31-2021.pdf>, 631.8.

Though policies are generally followed, interviewees highlighted potential opportunities to improve current processes. These improvements include clarifying responsibility for CBU maintenance, establishing permanent growth management positions throughout the agency, and standardizing the growth management process across the country.

Clarifying Responsibility for CBU Maintenance

Postal Service personnel and developers reported disagreement on who is responsible for maintaining and replacing CBUs, especially in communities without HOAs.

Our research highlighted communication gaps and a lack of policy enforcement related to the maintenance responsibility for CBUs. Postal Service policies assign the responsibility of CBU maintenance to the customer, which is also stated in the mode of delivery agreement. The mode of delivery agreement should be

signed by the Postal Service and the developer when they agree on the mode of delivery and mailbox placement at new homes. However, despite these policies and agreements, both Postal Service personnel and developers cited frequent disagreement over who is financially responsible for repairing broken delivery equipment, especially in communities without homeowner's associations (HOAs) – whose boards make decisions on behalf of property owners. The disagreement of maintenance ownership can lead to delayed repairs, maintenance, or potentially result in disrupted mail delivery. Disagreements or misunderstandings of responsibilities can be improved by effective communication between growth managers and developers, as well as by enforcing the signing of the mode of delivery agreement. Our research revealed that the agreement is rarely signed.

Establishing Permanent Growth Management Positions

Fostering relationships between the Postal Service and developers is beneficial for the consistent application of USPS policies and providing uninterrupted mail delivery for customers, according to individuals we interviewed. For example, several postmasters and district-level personnel explained they maintain frequent conversation with developers and builders to provide information

on mail delivery services. These postmasters and district personnel conduct outreach to counties, towns, and local home builders' associations to distribute contact information and proactively build connections. However, developing these relationships can be challenging.

One reason is the temporary nature of growth management positions at both the local and district levels. Growth managers and growth coordinators are not full-time, dedicated positions within the Postal Service. Instead, they are detail assignments, meaning a career employee is placed in the role temporarily. In addition, a growth manager may still have secondary duties in addition to their growth-related responsibilities. Then, after a prescribed time in the detail, that employee may return to their permanent position. As a result, there is frequent change of personnel in the growth manager role. Several Postal Service personnel in high-growth areas expressed a desire for permanent growth manager positions to help effectively manage the rapid growth in delivery points.

The lack of permanence in growth manager positions can also affect information sharing with developers and builders. When personnel rotate, developers and builders typically lose their contact person within the Postal Service and, at times, have difficulty identifying the new growth manager. In addition, several developers we interviewed did not feel that the Postal Service effectively communicated policy changes to the building community, particularly with the 2018 POM revisions. According to an interview with representatives from the National Association of Home Builders (NAHB), many developers did not know about the Postal Service's preference for centralized delivery for years. These developers stated they learned about the policy changes when new homeowners reported that they were not receiving mail.

Increased communication internally within the Postal Service could also be beneficial. District-level personnel interviewed noted communication with USPS headquarters regarding growth is extremely limited or nonexistent,

Postal Service personnel expressed a desire for the agency to establish permanent, specific growth management positions to help effectively manage rapid growth in delivery points.

especially since the 2021 reorganization of its areas and districts. In addition, the reorganization left the national growth manager position vacant.²⁰ Prior to the reorganization, USPS headquarters held monthly teleconferences with district growth personnel to keep districts informed and on the same page. The teleconferences have not resumed. The level of communication, or perceived lack of, has left district personnel uncertain about the internal reporting structure for growth management. Furthermore, they are uncertain on who to contact if they need assistance. As of November 2021, there is currently no national growth manager at Postal Service headquarters, but USPS management reported a plan to have someone replaced in that role soon.

Standardizing Delivery Point Growth Management

A June 2021 internal survey conducted by the Postal Service highlighted a lack of standardization in delivery point growth management across districts. The survey revealed that some districts have very hands-on delivery units and less involved district personnel, while others had the exact opposite, a theme echoed by our interviews. For example, one district-level growth coordinator said they encourage postmasters to oversee the entire process of establishing new delivery points and only get involved when needed. However, a postmaster in a different postal area indicated they direct developers to district-level personnel to oversee the process. More uniformity in assigning responsibilities could strengthen communication, increase postmasters' knowledge of how to establish new delivery points, and promote consistent enforcement of policies.

The Postal Service communicated intent to standardize the growth management process now that the agency's reorganization is complete. The plan is for delivery units – rather than districts – to be the primary points of contact for managing the process and interacting with developers and builders. District, area, and headquarters levels will promote Postal Service policies, while the post offices will implement and enforce them.

Maintaining Delivery Points

After delivery points are established and mail delivery begins, letter carriers are responsible to monitor every delivery point on their routes and flag changes as they occur. Carriers annotate changes in edit books, which list every possible delivery point on the carrier's route. A carrier can edit many characteristics associated with each delivery point, such as the address, whether it is vacant, the Congressional district, or the sequencing of delivery points on the route. Depending on the exact changes made, a carrier's edits can change the status of a delivery point. For example, a delivery point may change from an active delivery point to a no-stat delivery point, directly affecting the total count of active delivery points.

Figure 12: Carrier Edit Books

CARRIERS USE EDIT BOOKS TO CHANGE DELIVERY POINT STATUS

Carriers use edit books to make changes to individual delivery points on their routes, such as marking an address vacant or changing the apartment number. Some edits can change the status of a delivery point, such as moving the address from a no-stat delivery point to an active delivery point. Below is an example of a page in a carrier's edit book and sample notations.

SEQ #	PRIMARY ADDRESS	COMPLETE STREET NAME	SECV ABBR	SECV UNIT #	DELV TYPE	DSG	NO STAT	MAC	ADD	L I F	S	DR	OP	WDD	CO	RLY	ADDR #	#4	ADDITIONAL INFO	ALTERNATE ZIP / RTE
**R1	1 000	MIDWAY ST			OTH B												11 1	PC	1950	00346/C002
	2 123				OTH B	Y													1946	00346/C002
	3 1	MIDDLE ST			OTH R	Y													1951	00346/C002
delete	4 123				OTH B	Y													1951	00346/C002
	5 18				OTH R	Y													1951	00346/C002
	6 2020	MIDWAY ST			OTH R	Y											3	2	1925	00346/C002
	7 2024				OTH B	Y													1925	00346/C002
	8 2022				OTH R	Y				T	*								1947	00346/C002
	9 2024				OTH R	Y													1925	00346/C002
	10 400	N BROAD ST			OTH R	Y											10	3	0316	RXXOR
change	11 402				OTH B	Y													0316	F C SERVICE CTR
	12 404				OTH B	Y													0316	00346/
	13 747			APT 3-5	OTH R	Y													0303	00346/
BC2	14 850			STE	OTH B	Y													0385	11 WCCA WBA

Source: U.S. Postal Service.

²⁰ Prior to 2021, the Postal Service had 67 districts. However, in a reorganization plan announced on March 3, 2021, the Postal Service consolidated into 50 retail and delivery districts, which more closely align with state borders. The newly organized districts operate under the headquarters Retail and Delivery Operations function. Retail and Delivery Operations has four areas: West Pacific, Central, Southern, and Atlantic.

According to the Postal Service’s edit book training, carriers should note any delivery point changes as they occur and submit their edit books to their supervisor (Figure 12). Once approved by the supervisor, changes are submitted to the AMS team, which processes the changes and sends updated edit books back to the delivery unit.

Removing Delivery Points

The Postal Service’s policies on removing delivery points state that a delivery point should not be removed from AMS unless it is certain it will never become active again. Removing delivery points has operational implications. Every delivery point has a delivery point key, or a unique identifier associated with that address. According to the AMS Coding Manual, the delivery point key should be preserved to allow for changes to that delivery point be tracked. For example, when a customer moves, their prior residence may become temporarily vacant, but the delivery point should not be deleted because mail forwarding will occur

“Using the Delete function in AMS permanently removes the record from AMS and the assigned ZIP+4 Code immediately becomes available for reassignment. This function should only be used when absolutely necessary to maintain the integrity of the delivery point key.” -AMS Coding Manual

for a period and the residence might become active again. Deleting and re-adding the same delivery point would incorrectly result in a new delivery point key and the loss of the tracked changes associated with it.

Delivery points may be deleted if mail delivery will not resume at that address; for example, if a group of houses is demolished and replaced with a park, or other structure that will

not receive mail. Most of the time, an alternative approach to deletion – such as labeling a delivery point as a no-stat address – is preferable. A delivery point may be labeled as “no-stat” during renovation, demolition, or expansion, which indicates it is not counted as a possible delivery but may be reclassified as a possible delivery in the future. Carriers can also label a delivery point as ‘vacant’ if the address is currently unoccupied.

From the letter carriers’ perspective, edit books are used to report delivery points for potential deletion to their supervisor. After a supervisor’s approval, the

changes are submitted to AMS, who then decides whether the delivery point will be deleted, or whether another action is most appropriate.

The Importance of Edit Book Oversight

Carrier edit books are a key part of adding, maintaining, and removing delivery points. The accuracy of edit books is important as delivery point data directly impacts internal operations, finances, and external products.

The Postal Service uses AMS data to generate sort plans that automatically sort mail into delivery point sequence (DPS). Automatically sorting mail in delivery point order reduces manual mail sorting and helps improve the efficiency of mail delivery. Mailpieces that are missorted because of inaccurate delivery point information require manual sortation, which reduces efficiency. The Postal Service also offers several address-based products to mailers. As a result, it is important for the Postal Service to ensure the accuracy of delivery point information through oversight activities. If routes and delivery points are not maintained accurately, there can be impacts on the quality of its products and services and delivery route optimization efforts.

Finally, rural carriers are paid based on the number of delivery points on their route. As such, edit book oversight is important to help ensure their pay is calculated accurately. Untimely and inaccurate maintenance of a delivery point’s status could result in over- or underpayment to a rural carrier. For example, if a rural carrier does not flag a vacant address as a no-stat after 90 days, that delivery point would continue to be part of the carrier’s salary calculation. In some circumstances, reporting new delivery points on a rural route would result in the route becoming overburdened. Overburdened routes are cut, and some deliveries are assigned to other routes, resulting in a decrease in the carrier’s pay.

Currently, local delivery units implement two methods to confirm the count of delivery points on each route. First, local supervisors must approve edit book changes before they are submitted to AMS. Second, a supervisor should conduct street observations once per year to ensure – among other items – that the number of deliveries in the route’s edit book is correct.

Data suggests that there is an opportunity to strengthen the oversight of edit book maintenance. The Postal Service recommends – but does not require – that edit books be submitted as changes are made, or once a month. However, according to the Postal Service, 58 percent of city edit books and 33 percent of rural edit books have gone more than 30 days without submission. The Postal Service is aware of the large number of unsubmitted edit books and is developing ways to make delivery point management more efficient for local post offices. In June 2021, the Postal Service started a pilot program to streamline the edit book process for letter carriers and improve compliance. In the pilot program, implemented on both city and rural routes, carriers use their mobile delivery devices instead of physical edit books to automate the flagging of vacant addresses.

In addition to challenges with edit books, a recent OIG audit identified problems with street reviews on city routes. Even though street reviews should be performed annually on every city route, the audit found that only 22 percent of city routes had a current street observation performed in the last year.²¹ Unlike rural carriers, city carriers are paid hourly. Even though the number of delivery points does not directly impact a city carrier's pay, edit book accuracy on city routes still impacts the total count of delivery points and the status of each address. The high rate of unsubmitted edit books and the number of uninspected city routes suggests an opportunity to improve the oversight process, such as through target metrics or establishing deadlines for street reviews and edit book submissions.

Implications of a Growing Delivery Network

While centralized delivery modes are less costly than other modes, the changing mail mix, where parcels represent a growing share of deliveries, may be limiting the Postal Service's cost savings. In addition, delivery points impact the Postal Service's potential revenue because the number of delivery points was recently added as a factor in the Postal Service's ability to set prices.

Changing Mail Mix May Erode Cost Savings from Centralized Delivery

The mail mix – the composition of letters and packages in the mail stream – is changing. First-class mail volume peaked in 2001 and decreased by about half since then, while parcel volume increased due to growing ecommerce trends. In addition, the Postal Service's 10-year plan, published in March 2021, outlines strategies to further grow package volumes.²² The Postal Service promotes centralized delivery at new addresses because it is less costly than other modes of delivery. However, shifts from letter mail to package services may limit the cost savings of centralized delivery.

While centralized delivery increases the efficiency of delivering letters, it does not always increase the efficiency of package delivery. Both postal personnel and external stakeholders identified challenges with delivering the quantity and size of packages common today. CBUs include multiple letter slots and usually have at least one parcel locker. For example, one manufacturer offers cluster boxes with four to 16 letter slots and between one and four parcel lockers.²³ However, the parcel locker may not be large enough to accommodate all packages, or there may not be enough parcel lockers to deliver packages for a neighborhood. If a carrier cannot leave a package in the parcel locker, they need to deliver the package to the customer's door. The extra delivery is less efficient for the carrier. Separate, freestanding parcel lockers installed alongside CBUs can help with the volume of packages, but some packages are too large to fit in any locker. As more and more packages flow into the mail mix, the Postal Service may lose some of the cost savings gained from centralized delivery. Requiring a minimum number of parcel lockers for CBUs or increasing the size of parcel lockers could help the Postal Service mitigate this risk. In July 2020, the Postal Service revised the POM to require more parcel lockers in new, multifamily apartment buildings. Previously, Postal Service policy required one locker for every 10 mailboxes; the revised policy requires one locker for every five mailboxes. However, there are currently no requirements for a minimum number of CBU parcel lockers. With

²¹ The audit only reported street observation data for city routes. U.S. Postal Service Office of Inspector General, *City Delivery Operations – Nationwide Route Management*, Report No.21-127-R22, February 17, 2022, <https://www.uspsoig.gov/sites/default/files/document-library-files/2022/21-127-R22.pdf>, p. 7.

²² U.S. Postal Service, *Delivering for America: Our Vision and Ten-Year Plan to Achieve Financial Sustainability and Service Excellence*, March 2021, https://about.usps.com/what/strategic-plans/delivering-for-america/assets/USPS_Delivering-For-America.pdf.

²³ Florence Corporation, *2021 Full Line Product Catalog: Centralized Mail & Package Solutions*, <https://www.florencemailboxes.com/sites/default/files/2021-04/2021%20Florence%20Product%20Catalog%20-%20DIGITAL.pdf>, p. 8.

package volume expected to grow, it is important that the Postal Service identify additional opportunities to maximize the efficiency of each delivery.

Delivery Points Can Impact Costs and Revenues

While the delivery network grows, mail volume is declining. Between FYs 2011 and 2021, total mail volume (including letter mail and packages) decreased 23 percent. During the same period, delivery points increased 10 percent. A larger delivery network and less mail result in fewer mailpieces per delivery point. Total mail volume divided by the total number of delivery points, also known as mail density, decreased 29 percent since FY 2011.

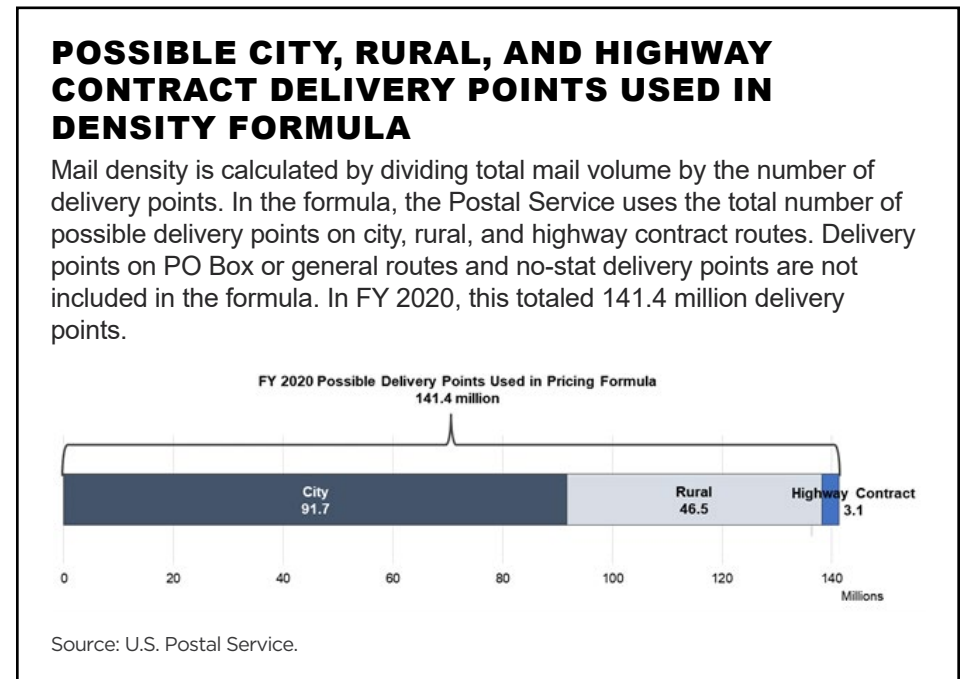
In November 2020, the Postal Regulatory Commission approved new market dominant pricing rules that incorporate a calculation of mail density into the Postal Service's pricing authority.²⁴ Before the approval of a new pricing authority, the number and status of delivery points primarily affected internal operations and address products for mailers. Under the new rules, delivery points now also impact the Postal Service's ability to set prices.

In August 2021, the Postal Service increased market dominant prices using the new rules for the first time. The density-based pricing authority allowed for a 4.5 percent price increase. Declining mail volume between FYs 2019 and 2020 – rather than an increase in delivery points – drove most of the increase. Including the other pricing authorities available to the Postal Service, market dominant prices increased by about seven to nine percent in total. In contrast, prices increased less than two percent in 2020, when this rule did not yet exist.

To compute mail density, the Postal Service uses the number of possible delivery points on city, rural, and highway contract routes. The Postal Service does not consider the number of no-stat or removed delivery points in the pricing formula. In FY 2020, this totaled 141.4 million delivery points (Figure 13). The Postal Service plans to increase market dominant prices again in July 2022.²⁵ Current formulas project that the density rate authority will allow for a 0.583 percent price increase, driven mostly by increases in delivery points.

Further mail volume declines and the addition of more delivery points will continue to decrease density, leading to more authority to increase market dominant prices.

Figure 13: Delivery Points and Mail Density



Delivery points and delivery mode also impact carrier costs. On rural routes, carriers are paid the same amount each day based on their route evaluation. In contrast, city carriers are paid hourly. Rural carriers receive different pay for different types of delivery. For example, a rural carrier earns two minutes of pay for each curbside box on the route and one minute of pay for each centralized compartment. While a growing number of delivery points translates into higher delivery costs, increasing the percentage of centralized delivery points can help contain the cost increase.

²⁴ Postal Service products are divided into two categories: market dominant and competitive. Market dominant products do not have direct competition and include products such as First-Class Mail, marketing mail, and periodicals. Competitive products have competition from other providers and primarily include the Postal Service's package products.

²⁵ Beginning in 2023, the Postal Service expects to raise market dominant prices twice per year, in January and July each year. The density-based pricing authority will be applied to the annual July price increase.

Conclusion

Current trends in new delivery points indicate high rates of growth in the southern and western U.S., and on rural postal routes. While the Postal Service is mandated by law to serve all delivery points, it has the flexibility to control the costs of delivering to new addresses by promoting more efficient modes of delivery such as centralized delivery.

As more addresses are added to the network, there are opportunities for the Postal Service to strengthen delivery point management processes, such as clarifying maintenance and repair responsibility for CBUs, establishing permanent growth manager positions across the agency, and standardizing the process across delivery units and districts. In addition, the effective oversight of carrier edit

books and increased transparency of delivery point statistics could help improve the accuracy of AMS data. Maintaining accurate data is important because the number of possible delivery points in AMS impacts the Postal Service's delivery operations planning, the quality of address-based products offered to customers, as well as its costs and revenue.

Finally, the mode of delivery to new addresses and the growing volume of packages in the mail mix also impact the Postal Service's operational efficiency and costs. Increasing package volumes may not fit in centralized parcel lockers, resulting in more door deliveries, and potentially impacting cost savings associated with centralized delivery modes. Installing new or larger parcel lockers and requiring a minimum number of parcel lockers in CBUs offer opportunities to reduce the number of door deliveries and reduce costs.

Appendices

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Appendix A: Additional Information

The objectives of this research were to:

1. Review the process for establishing new delivery points and the process for removing delivery points that no longer exist.
2. Analyze trends in delivery points for Fiscal Years (FYs) 2011 through 2021.

The scope of this research was FYs 2011 through 2021.

We used a mixed methods approach for this white paper, including interviews, document review, and analysis of relevant Postal Service data.

We conducted 13 interviews with 32 individuals in total. Seventeen of these individuals work for the Postal Service, including four local personnel (for example, postmasters), eight district or area personnel, and five headquarters personnel. We interviewed 15 people from external organizations including local governments, professional associations, and real estate developers.

To identify postmasters to interview, we used data from the U.S. Census to identify counties with the highest rates of housing growth between the 2010 and 2020 Census. We reached out to a sample of postmasters in these areas, ensuring our selection included postmasters in multiple states and areas of the country. Two of the postmasters we interviewed provided contact information for their district growth coordinators, whom we subsequently interviewed.

For some data analysis, we segmented the country into six categories based on each ZIP Code's population density. We calculated population density based on land area and population data from the U.S. Census. Population data were from 2019, the most recent year of data available. The six urbanization categories are below. We selected these six categories and the population density thresholds because the Postal Service has used these categories in some internal analyses.

- Very Rural – 25 or fewer people per square mile
- Rural – 26-125 people per square mile
- Pre-Suburban – 126-250 people per square mile
- Suburban – 251-5,000 people per square mile
- Urban – 5,001-10,000 people per square mile
- Very Urban – More than 10,000 people per square mile

The research was conducted in accordance with the Council of the Inspectors General on Integrity and Efficiency's Quality Standards for Inspection and Evaluation. We discussed our observations and conclusions with management on March 30, 2022 and included their comments where appropriate.

Prior Coverage

The OIG did not identify any prior audits or reviews published in the last five years related to the objective of this white paper.

Appendix B: Growth in Active Delivery Points FY11-FY21, by State

State	FY11 Delivery Points ²⁶	FY21 Delivery Points	% Growth	% Growth Curbside Delivery	% Growth Centralized Delivery	% Growth CBU Delivery	% Growth Other Delivery
Alabama	2,059,218	2,265,789	10%	11%	12%	23%	-4%
Alaska	199,877	220,630	10%	6%	3%	23%	0%
Arizona	2,498,693	2,917,574	17%	8%	41%	10%	3%
Arkansas	1,216,760	1,352,999	11%	11%	10%	45%	-3%
California	13,710,922	14,684,555	7%	1%	6%	24%	1%
Colorado	2,066,157	2,416,358	17%	6%	24%	39%	1%
Connecticut	1,478,272	1,554,805	5%	4%	11%	23%	1%
Delaware	383,207	441,569	15%	16%	-2%	43%	1%
District of Columbia	296,355	351,936	19%	-22%	31%	30%	3%
Florida	8,553,518	9,862,323	15%	11%	17%	40%	-3%
Georgia	3,923,255	4,447,223	13%	10%	17%	49%	-3%
Hawaii	444,964	482,671	8%	4%	14%	29%	-8%
Idaho	582,868	718,399	23%	16%	21%	83%	2%
Illinois	5,067,973	5,307,460	5%	4%	9%	23%	0%
Indiana	2,687,244	2,900,567	8%	9%	-1%	41%	-2%
Iowa	1,235,495	1,346,097	9%	4%	9%	88%	-2%
Kansas	1,164,036	1,243,965	7%	10%	7%	22%	-6%
Kentucky	1,817,931	1,964,988	8%	9%	5%	23%	-1%
Louisiana	1,912,315	2,089,450	9%	12%	11%	22%	0%
Maine	551,556	614,296	11%	13%	16%	26%	2%

²⁶ Data includes delivery points on city, rural, and highway contract routes. Delivery points on PO Box or general routes are excluded.

State	FY11 Delivery Points ²⁶	FY21 Delivery Points	% Growth	% Growth Curbside Delivery	% Growth Centralized Delivery	% Growth CBU Delivery	% Growth Other Delivery
Maryland	2,348,223	2,537,997	8%	5%	11%	25%	0%
Massachusetts	2,744,270	2,935,304	7%	7%	14%	29%	1%
Michigan	4,203,458	4,426,298	5%	6%	2%	30%	-1%
Minnesota	2,211,903	2,427,421	10%	6%	21%	36%	0%
Mississippi	1,205,398	1,301,434	8%	9%	6%	21%	-3%
Missouri	2,549,090	2,754,778	8%	9%	9%	36%	-2%
Montana	369,946	427,954	16%	10%	1%	52%	0%
Nebraska	735,071	813,822	11%	7%	16%	41%	-3%
Nevada	1,054,788	1,255,027	19%	6%	18%	28%	4%
New Hampshire	530,180	585,103	10%	10%	17%	24%	2%
New Jersey	3,508,955	3,717,561	6%	4%	15%	24%	0%
New Mexico	740,776	799,240	8%	3%	21%	13%	0%
New York	7,442,684	7,873,845	6%	6%	10%	26%	0%
North Carolina	4,017,382	4,664,694	16%	11%	24%	71%	-3%
North Dakota	270,885	331,802	22%	12%	22%	102%	-4%
Ohio	4,960,664	5,223,449	5%	6%	9%	28%	-1%
Oklahoma	1,536,529	1,700,293	11%	16%	13%	19%	-4%
Oregon	1,576,944	1,759,551	12%	4%	27%	23%	0%
Pennsylvania	5,326,836	5,591,816	5%	5%	12%	26%	0%
Rhode Island	456,760	474,375	4%	6%	6%	17%	0%
South Carolina	1,976,127	2,345,900	19%	13%	29%	78%	-8%
South Dakota	309,175	356,297	15%	13%	13%	68%	-4%

State	FY11 Delivery Points ²⁶	FY21 Delivery Points	% Growth	% Growth Curbside Delivery	% Growth Centralized Delivery	% Growth CBU Delivery	% Growth Other Delivery
Tennessee	2,746,371	3,111,662	13%	11%	24%	52%	0%
Texas	9,855,523	11,859,442	22%	13%	27%	51%	-1%
Utah	912,831	1,128,672	24%	7%	27%	63%	0%
Vermont	243,275	269,088	11%	11%	25%	24%	1%
Virginia	3,282,874	3,631,984	11%	9%	17%	24%	1%
Washington	2,734,451	3,130,658	14%	3%	19%	43%	-1%
West Virginia	717,016	762,198	6%	7%	7%	28%	-4%
Wisconsin	2,454,283	2,635,666	7%	8%	16%	31%	-1%
Wyoming	200,293	221,197	10%	9%	12%	23%	1%
Total	126,156,993	139,351,460	10%	8%	15%	34%	0%

Appendix C: Management's Comments

VICE PRESIDENT, DELIVERY OPERATIONS
HEADQUARTERS



April 12, 2022

JENNIFER MYKIJEWYCZ
DIRECTOR, OPERATIONS CENTRAL
RESEARCH AND INSIGHTS SOLUTION CENTER

SUBJECT: Management Response: Trends in New Delivery Points – White
Paper (2021RISC013)

Thank you for the opportunity to review and comment on the Office of Inspector
General's (OIG's) white paper: *Trends in New Delivery Points*.

Our mission is to show up and deliver in a professional, efficient, trusted and
visible manner.

We have performance expectations, actionable metrics and appropriate
ownership of the work performed and service provided for every employee,
supervisor, manager and leader.

We seek continuous improvement in all actions, tasks and efforts to include the
proper handling of new delivery points

E-SIGNED by Tyrone M Williams
on 2022-04-13 09:55:54 CDT

Angela H. Curtis

cc: *Manager, Corporate Audit Response Management*

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