



December 3, 2008

THERESA D. BACHMAN
SENIOR PLANT MANAGER, LOUISVILLE PROCESSING AND DISTRIBUTION
CENTER

SUBJECT: Audit Report – Powered Industrial Vehicle Management System at the
Louisville, Kentucky Processing and Distribution Center
(Report Number NO-AR-09-001)

This report presents the results of our review of the Powered Industrial Vehicle Management System (PIVMS)¹ at the Louisville, Kentucky Processing and Distribution Center (P&DC) located in the Eastern Area (Project Number 08XG040NO000). Our objectives were to determine if the PIVMS was functioning as intended and producing efficiency improvements. See [Appendix A](#) for additional information about this audit.

Conclusion

Although the Louisville P&DC successfully used the majority of operational features of the PIVMS and began to show overtime workhour reductions in fiscal year (FY) 2008, opportunities for improvement remain. The Louisville P&DC did not always use the PIVMS to manage workhours, conduct maintenance activities, and reduce vehicle inventory.

By completing these activities, we estimated management could reduce workhours by 5,000 by the end of FY 2009, with an associated economic impact of \$1.9 million in savings occurring over 10 years. In addition, the Louisville P&DC could reduce its vehicle inventory by two industrial vehicles² and stop leasing additional PIV equipment. This reduction in rental expense would result in an associated economic impact of \$11,535 in savings over 2 years.

Use of the PIVMS at the Louisville Processing and Distribution Center

Although management at the Louisville P&DC successfully used the majority of operational features of the PIVMS, there were opportunities for additional improvements.

The Louisville P&DC did not always use the PIVMS to:

- Manage equipment operator workhours or overtime.

¹ The PIVMS consists of intelligent wireless devices installed on powered industrial vehicles (PIV) and client-server software for access control, utilization analysis, real-time location tracking, and many other functions.

² We will calculate the costs associated with the vehicle reductions in our capping report.

- Schedule and complete preventive maintenance.
- Monitor vehicle battery usage.
- Identify opportunities to reduce vehicle inventory.

In addition, although management used the PIVMS to identify the employee logged into a vehicle when an accident occurred, they occasionally bypassed some safety and security features. See [Appendix B](#) for our detailed analysis of these issues.

Workhour and Overtime Trends

We concluded that efficiency improved slightly during the 12-month period after management implemented PIVMS in August 2006. However, although workhours used in tow and forklift operations from FYs 2005 to 2007 decreased by almost 3 percent, overtime used in these operations increased by almost 17 percent. See [Appendix C](#) for our detailed analysis of this issue.

We also compared the Louisville P&DC to 20 P&DCs that had the PIVMS installed for at least 1 year. These sites reduced tow and forklift workhours by more than 10 percent from FYs 2005 to 2007, and decreased overtime during this same period by over 13 percent. See [Appendix D](#) for our detailed analysis of this topic.

Causes

We concluded that efficiency improvements from the PIVMS did not occur at the Louisville P&DC due to several factors. We found:

- Management did not provide PIVMS training to all employees who needed to use the system due to high supervisory and management turnover.
- Management was not aware of any established national goals or requirements for the PIVMS.

Criteria

The President's Commission on the United States Postal Service recommended on July 31, 2003, that the mission of the U.S. Postal Service be “. . . to provide high-quality, essential postal services to all persons and communities by the most cost-effective and efficient means possible at affordable and, where appropriate, uniform rates.”

Title 39 U.S.C., Part 1, Chapter 4, § 403, states “The Postal Service shall plan, develop, promote, and provide adequate and efficient postal services at fair and reasonable rates and fees.”

The Postal Accountability Enhancement Act, H.R. 6401, dated December 8, 2006, Title II, indicates “. . . the need for the Postal Service to increase its efficiency and reduce its costs, including infrastructure costs, to help maintain high quality, affordable postal services. . . .”

Effect

By using the PIVMS as intended, the Postal Service could increase operational efficiency at the Louisville P&DC. We estimated management could reduce 5,000 mail processing workhours by the end of FY 2009, with an associated economic impact of \$1.9 million in savings occurring over 10 years. See [Appendix E](#) for more details. In addition, the Louisville P&DC could reduce the number of industrial vehicles in its fleet by two and not incur future PIV rental expense resulting in an associated economic impact of \$11,535 in savings over 2 years.

Management Actions

Management was aware of and supported the need to achieve an acceptable return on investment from the PIVMS. Management has measures in place that should allow for continued improvement. We noted that during FY 2008, overtime used in tow and forklift operations began to decrease. At our exit conference on September 24, 2008, Louisville P&DC management committed to improve efficiency and reduce equipment inventory by two vehicles. We noted management had not established specific PIVMS goals and targets and we will address these issues in our capping report. We will also examine costs associated with vehicle reductions in our capping report.

Recommendations

To ensure the PIVMS at the Louisville P&DC functions as intended and produces efficiency improvements, we recommend the Senior Plant Manager, Louisville P&DC:

1. Use the Powered Industrial Vehicle Management System to the fullest extent possible to manage operations and continue to improve mail processing efficiency by reducing 5,000 workhours in tow and forklift operations by the end of fiscal year 2009, with an associated economic impact of \$1.9 million in savings occurring over 10 years.
2. Discontinue leasing Powered Industrial Vehicles by Quarter 2, fiscal year 2009. This could produce a savings of \$11,535 over 2 years.
3. Reduce industrial vehicle inventory by two by the end of fiscal year 2009.
4. Provide Powered Industrial Vehicle Management System training to all employees who need to use the system by Quarter 2, fiscal year 2009.

Management's Comments

Management agreed with the findings, recommendations, and monetary impact. They have reduced some workhours and ceased leasing PIVs. They will continue to reduce workhours to achieve the recommendation, retire two PIVs, and conduct training. See [Appendix F](#) for management's comments, in their entirety.

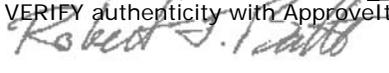
Evaluation of Management's Comments

The U.S. Postal Service Office of Inspector General (OIG) considers management's comments responsive to the recommendations and management's corrective actions should revolve the issues identified in the report.

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

We will report \$1,981,643 in funds put to better use in our *Semiannual Report to Congress*.

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

E-Signed by Robert Batta 
VERIFY authenticity with ApproveIt


Robert J. Batta
Deputy Assistant Inspector General
for Mission Operations

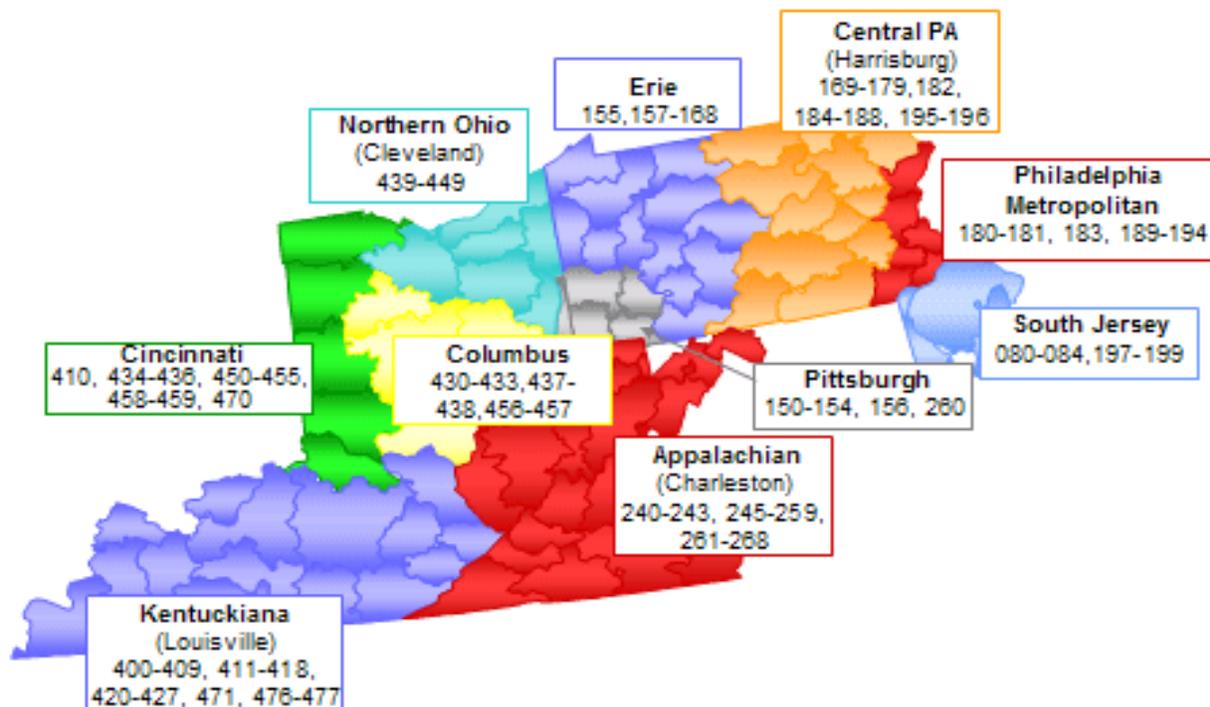
Attachments

cc: Patrick R. Donahoe
William P. Galligan
Anthony M. Pajunas
David E. Williams, Jr.
Clovis L. Christenbury II
Katherine S. Banks

APPENDIX A: ADDITIONAL INFORMATION

BACKGROUND

The Louisville P&DC is in the Kentuckiana District in the Eastern Area. The map below shows the Eastern Area Districts by three-digit ZIP Code.



The Louisville P&DC processed almost 1.3 billion first handling pieces (FHP) of mail and used over 1.4 million workhours in FY 2007. The Postal Service owns the Louisville P&DC, which has occupied this facility since March of 1977. The building contains 393,684 square feet of interior space on a site with dimensions of 1,845,768 square feet.

The Louisville P&DC implemented the PIVMS in August 2006 at a projected cost of \$292,302. The Postal Service justified the purchase based on:

- Elimination of unauthorized use of PIVs;
- Reduction of injuries caused by unsafe operation of PIVs;
- Reduction of damage to mail and equipment caused by unsafe operation of PIVs;
- Reduction of workhours used to transport mail and equipment throughout the plant;
- Reduction of number of pieces of equipment needed to perform this work; and
- Reduction of workhours needed to maintain the fleet of PIVs.

This implementation was part of a national contract the Postal Service awarded to I.D. Systems, Inc. of Hackensack, New Jersey in January 2005 to produce and deploy the PIVMS. The Postal Service started the program essentially as a pilot when it signed a \$3.6 million contract with I.D. Systems to implement a wireless asset management system at ten bulk mailing and distribution facilities across the country. As of April 2008, the Postal Service placed orders for PIVMS deployment in 80 facilities. The total amount funded for the PIVMS as of May 2008 was over \$31 million.

The Postal Service intended the PIVMS to provide automated measurement, control, and compliance reporting of PIV operations within a plant, resulting in optimal PIV safety conditions, operations, supervision, and associated savings. Some of the major system design features included:

- Two-way text messaging.
- Compliance with Occupational Safety and Health Administration (OSHA) safety standards by only allowing currently certified operators to logon and operate specified equipment.
- Increased safety and accountability by shutting down vehicles after recording significant impacts.
- Ability to measure the amount of time an operator is logged into a vehicle and the amount of time the vehicle is in motion.
- Ability to locate and track vehicles within a plant.

OBJECTIVES, SCOPE, AND METHODOLOGY

Our objectives were to determine if the PIVMS was functioning as intended and produced efficiency improvements. To accomplish these objectives, we observed mail processing operations and analyzed volume and workhour trends at the Louisville P&DC. The Louisville P&DC implemented the PIVMS before the end of FY 2006, so we benchmarked the Louisville P&DC with sites that implemented the PIVMS after FY 2006. We also evaluated the utilization and capacity, staffing levels, and inventory of powered equipment at the Louisville P&DC.

To conduct this audit, we relied on computer-processed data maintained by Postal Service Operational Systems, which included the Web Enterprise Information System (WebEIS), Management Operating Data System (MODS), Web-based Complement Information System (webCOINS), and the Enterprise Data Warehouse (EDW) systems.

We did not test the validity of controls over these systems. However, we checked the accuracy of the data by confirming our analysis and results with Postal Service managers and different data sources. In addition, we relied on OIG audits of Postal

Service systems. For example, an OIG review of the MODS concluded the data in this system was valid and reliable for the uses for which it was intended.³

We conducted this audit from August through November 2008 in accordance with generally accepted government auditing standards and included such tests of internal controls that 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 objectives. We believe the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives. We discussed our observations and conclusions with management on September 24, 2008, and included their comments where appropriate.

PRIOR AUDIT COVERAGE

We issued a report on PIVMS use at the Raleigh P&DC titled *Powered Industrial Vehicle Management System at the Raleigh Processing and Distribution Center* (Report Number NO-AR-08-007, dated September 15, 2008), which reported \$3,345,456 in funds put to better use. We also issued a report on PIVMS use at the Providence P&DC titled *Powered Industrial Vehicle Management System at the Providence Processing and Distribution Center* (Report Number NO-AR-08-007, dated September 23, 2008), which reported \$1,576,086 in funds put to better use. We concluded that neither P&DC used the PIVMS as intended and, consequently, they did not fully realize efficiency improvements.

³ *Management Operating Data System* (Report Number MS-AR-07-003, dated August 21, 2007).

APPENDIX B: DETAILED ANALYSIS

USE OF THE POWERED INDUSTRIAL VEHICLE MANAGEMENT SYSTEM

We found the Louisville P&DC did not always use the PIVMS to:

- Manage equipment operator workhours or overtime.
- Schedule and complete preventive maintenance.
- Monitor vehicle battery usage.
- Identify opportunities to reduce vehicle inventory.

In addition, although management used the PIVMS to identify the employee logged into a vehicle when an accident occurred, it occasionally bypassed some safety and security features.

Management of Equipment Operator Workhours

Although the Louisville P&DC successfully used the majority of operational features of the PIVMS, there were opportunities for additional improvements. For example, we reviewed the number of logon accesses to the PIVMS and found that 24 of the 35 mail processing managers and supervisors (68.5 percent) logged into the PIVMS in the month of July 2008. We interviewed supervisors and found the majority of them accessed the PIVMS only for tasks such as starting vehicles for employees or locating vehicles parked in non-designated locations.

We also found the majority of Louisville P&DC supervisors did not use the PIVMS reports. The PIVMS reports allow management to monitor and measure vehicle utilization attributes such as simultaneous vehicle usage, speed, distance traveled, idle time, motion time, and motion time while carrying or pulling a load in order to assess productivity.

Maintaining Vehicle Equipment and Monitoring Battery Usage

The Louisville P&DC did not always use the PIVMS reports to schedule preventive maintenance or ensure it was performed. Instead, management used the Electronic Maintenance Activity Reporting and Scheduling System (eMARS) to schedule maintenance.⁴ The PIVMS maintenance tool provides the ability to forecast, schedule, and process preventative maintenance events. By using this tool, management could more effectively manage preventive maintenance of vehicles.

In addition, we found management did not use the PIVMS battery management system to monitor battery usage. The purpose of the PIVMS Battery/Charger Administration

⁴ We will address the use of eMARS in our national capping report.

module is to extend vehicle battery life and reduce battery inventory.⁵ We found management installed electronic battery fobs to track battery usage on most of the PIV batteries at the Louisville P&DC, but was not using the PIVMS battery management system to track battery usage or abuse. In addition, management did not number or track batteries at the Louisville P&DC in any inventory system.

Vehicle Inventory Management

Since PIVMS implementation, management reduced PIV equipment by four pieces (see Table 1 below); however, management did not use the PIVMS to identify opportunities to make these reductions.

TABLE 1: POWERED INDUSTRIAL VEHICLES AT THE LOUISVILLE P&DC

Powered Industrial Vehicle Inventory			
	August 2006	August 2008	Increase/Decrease
Forklifts	15	11	-4
Tows	20	20	0
TOTAL	35	31	-4

We concluded the Louisville P&DC could reduce its inventory by another two pieces of PIV equipment. We found the maximum number of vehicles used simultaneously from November 2006 to July 2008 was 29, indicating a possible surplus of two vehicles. In addition, the maximum number of powered equipment operators scheduled to work at any one time was 22, also indicating there were more than enough vehicles for equipment operators to use.

During our observations on all tours, we often found vehicles idle. See Illustrations 1 and 2.

⁵ Industrial batteries provide a maximum return on investment when discharged to appropriate levels during operation and allowed to recharge and cool down for enough time during their charge cycles. I.D. Systems' Fleet Management System notifies the operator when the battery has discharged sufficiently and should be replaced.



Illustration 1: Forklift found idle on August 14, 2008, at 5:07 p.m.



Illustration 2: Tow motor found idle on August 14, 2008, at 5:11 p.m.

We also found unused equipment awaiting parts and repair in the maintenance unit. Finally, we found that even with this excess inventory, Louisville P&DC management rented additional PIV equipment in the months of December 2006 and 2007 at an average cost of \$5,768.

During our audit, management reviewed equipment needs and agreed to reduce vehicle inventory by two vehicles and to cease rental of additional PIV equipment. We will examine the costs associated with vehicle reductions in our capping report.

Safety and Security Features

Management at the Louisville P&DC occasionally bypassed some of the PIVMS security features designed to ensure compliance with OSHA. For example:

- One of the PIVMS safety design features only allows certified operators to logon and operate specified equipment. However, Louisville P&DC supervisors sometimes used master badges with override capability to start vehicles for operators.
- Another PIVMS safety design feature requires the operator to complete an electronic OSHA checklist (see Illustration 3) within a prescribed time after logging on to the vehicle. However, we observed that some equipment operators did not complete the OSHA safety checklist at the start of their tour.



Illustration 3: Employee used proper identification and the electronic OSHA checklist to start a vehicle on August 14, 2008, at 5:29 p.m.

Management used the PIVMS on several occasions to identify the employee logged into a vehicle when an accident occurred. During our review at the Louisville P&DC, we did not observe unsafe driving practices or accidents. However, we found prior damage to the building and confirmed vehicle impacts caused it. See Illustration 4.



Illustration 4: South side of Louisville P&DC with damage to brick wall, August 14, 2008, at 3:36 p.m.

We also found that management did not always run or review PIVMS OSHA Compliance and OSHA Compliance Exception Reports. These reports allow management to track and monitor OSHA compliance, correct non-compliance, and report OSHA issues to higher management.

APPENDIX C: VOLUME AND WORKHOUR TRENDS

We reviewed mail volume, workhours, productivity, and complement trends for the Louisville P&DC for FYs 2005 through 2007. During this period, FHP volume at the Louisville P&DC decreased by 3.89 percent and mail processing (Function 1)⁶ workhours decreased by 7.5 percent. Consequently, overall mail processing productivity increased by 3.91 percent.

From FYs 2005 to 2007, workhours used in tow and forklift operations at the Louisville P&DC decreased by 2.61 percent and overtime used in these operations increased by 16.59 percent. We noted that during FY 2008, overtime used in tow and forklift operations began to decrease. For example, the Louisville P&DC used almost 23 percent less overtime in these operations in July of FY 2008 than in July of FY 2007.

In FY 2007, the Louisville P&DC used 6.85 percent of mail processing workhours in tow and forklift operations. There were 50 equipment operators at the P&DC in FY 2007, an increase of one operator since FY 2005.

We also reviewed tow and forklift workhours 12 months prior to and after implementation. Management implemented the PIVMS at the Louisville P&DC on August 8, 2006, and achieved a 4.72 percent decrease in Function 1 workhours and a 7.07 percent decrease in tow and forklift workhours after this implementation. See Table 2.

**TABLE 2: LOUISVILLE P&DC TRENDS
BEFORE AND AFTER PIVMS IMPLEMENTATION**

Louisville P&DC PIVMS Implementation Date - August 3, 2006							
12 Months Before PIVMS Implementation			12 Months After PIVMS Implementation			Percentage Changes	
Function 1 Hours	Tow and Forklift Hours	Percentage Tow and Forklift Hours to Function 1 Hours	Function 1 Hours	Tow and Forklift Hours	Percentage Tow and Forklift Hours to Function 1 Hours	Function 1 Hours	Tow and Forklift Hours
1,502,686	104,369	6.95	1,431,781	96,991	6.77	-4.72	-7.07

⁶ Function 1 is a workhour category the Postal Service uses to specifically identify mail processing workhours.

APPENDIX D: COMPARISONS TO OTHER FACILITIES

In order to better assess the effects of PIVMS, we reviewed volume, workhour, productivity, and complement trends for P&DCs that had the PIVMS installed before the end of FY 2006, so there was at least one fiscal year of data. For the 20 sites meeting these criteria, we reviewed volume, workhour, and productivity trends from FYs 2005 through 2007. During this period, volume at these sites increased slightly (.95 percent) and mail processing (Function 1) workhours decreased by 6.69 percent. Consequently, productivity increased by 11.10 percent.

From FY 2005 to 2007, workhours used in tow and forklift operations at these sites decreased by 10.47 percent and overtime used in these operations decreased by 13.38 percent. In FY 2007, the average site used 5.97 percent of mail processing workhours in tow and forklift operations. The number of equipment operators increased by 1.92 percent between FYs 2005 and 2007.

Comparing Louisville P&DC to these sites:

- From FY 2005 to FY 2007, the average site reduced tow and forklift workhours by 10.47 percent. The Louisville P&DC ranked 8th out of 20 sites in this percentage change comparison.
- The average site reduced tow and forklift overtime by 13.38 percent. The Louisville P&DC ranked 17th out of 20 sites in this percentage change comparison.

The average of these 20 sites reduced tow and forklift workhours by 7.03 percent during the 12 months after implementation, compared to the Louisville P&DC's decrease of 7.07 percent, which was very comparable to the other P&DCs that implemented the PIVMS during FY 2006. See Table 3.

TABLE 3: LOUISVILLE P&DC WORKHOURS COMPARED TO OTHER P&DCS WITH PIVMS, BEFORE AND AFTER IMPLEMENTATION

	12 Months Before PIVMS	12 Months After PIVMS	Percentage Change Tow And Forklift Workhours
Louisville P&DC	104,369	96,991	-7.07
Average P&DC With PIVMS	113,403	105,430	-7.03

APPENDIX E: CALCULATION OF FUNDS PUT TO BETTER USE

By using the PIVMS as intended, we estimated that management could reduce 5,000 workhours by the end of FY 2009.

- The Louisville P&DC had FHP productivity in FY 2007 of 899 mailpieces per workhour, which was better than the average FHP productivity of the 20 sites of 827 mailpieces per workhour.
- We calculated earned workhours using an average FHP productivity of 827 mailpieces per workhour for mail processing operations (Function 1).
- We determined the percentage of workhours used in tow and forklift operations to total function for the sites that had better than average FHP productivity to be 5.97 percent.
- The Louisville P&DC used 6.85 percent of earned Function 1 workhours in tow and forklift operations in FY 2007.
- We multiplied 5.97 by the calculated earned workhours for the Louisville P&DC of 1,550,871 to determine that earned tow and forklift workhours were 92,658. Compared to the actual workhours used in these operations of 97,615 in FY 2007, this was a difference of 4,957 workhours.

Louisville P&DC management agreed to reduce 5,000 workhours. This workhour savings has an associated economic impact of \$1.9 million (net present value) in savings over 10 years.

FUNDS PUT TO BETTER USE (WORKHOUR SAVINGS)

Employee Category Impacted	Workhour Reduction	Time Frame 10 Fiscal Years Discounted Savings (Net Present Value)
Function 1 Mail Processing Mail Handler Workhours	5,000	\$1,970,108

NOTES

- We based the 5,000 workhour reduction on management’s plan to reduce workhours over a 1-year period, based on FY 2007 usage.
- We calculated the cost avoidance using the savings in workhours multiplied by the escalated labor rate over a 10-year period.
- We calculated the net present value using the June 6, 2008, discount rate of 4 percent over a 10-year period.
- We based labor rates on FY 2009 Actual Wage Rates and FY 2008 and 2009 projections on the Postal Service’s published rates for a level 05 (PS-05) mailhandler.
- The yearly escalation factor is 2.2 percent, based on the Postal Service’s Decision Analysis Factors, effective June 6, 2008.

Management also agreed to cease renting PIV equipment. At an average annual expense of \$5,768, this represents a savings of \$11,535 over a 2-year period.

FUNDS PUT TO BETTER USE (RENTAL EXPENSE REDUCTION)

Vehicle Rental Expense	Average Rental Expense Reduction	Time Frame 2 Fiscal Years
PIV Rental Expense	\$5,768	\$11,535

APPENDIX F: MANAGEMENT'S COMMENTS

SENIOR PLANT MANAGER
LOUISVILLE, KY P&DC



November 13, 2008

MEMORANDUM FOR Lucine Willis
Director, Audit Operations
1735 North Lynn St.
Arlington, VA 22209-2020

SUBJECT: Powered Industrial Vehicle Management System at the Louisville, Kentucky Processing and Distribution Center (Report Number NO-AR-09-DRAFT)

Thank you for the opportunity to review and comment on the subject draft audit report.

Management agrees with the basic findings of the OIG Audit performed here at the Louisville P&DC.

We will re-focus the usage of PIVMS to concentrate on the following:

- Manage equipment operator work hours and overtime more efficiently
- Monitor vehicle battery usage
- Identify opportunities to reduce vehicle inventory
- Ensure the safety and security of our employees by not bypassing PIVMS safety and security features

By performing the above actions we will provide a safer work environment for our employees, eliminate unnecessary vehicles, reduce maintenance costs associated with PIV equipment, and more efficiently utilize our PIV work hours.

There are four major recommendations made by the OIG.

Recommendation 1. Use the Powered Industrial Vehicle Management System (PIVMS) to the fullest extent possible to manage operations and continue to improve mail processing efficiency by reducing 5,000 work hours in tow and forklift operations by the end of fiscal year (FY) 2009, with an associated economic impact of \$1.9 million in savings over a ten year time period.

Response: Management agrees with this recommendation. Since the time of the PIVMS audit, we have removed flat sorter operations from day shift. As a result of this move, two PIV mail handler positions were abolished. Based on the current HQ ratio of 1763 hours per year for a position, this puts us well on our way of meeting the expected 5000 hour reduction. We will continue to use PIVMS to evaluate current processes and make further reductions to meet the 5000 hour reduction by 9/30/2009. Mark Hulme, Senior MDO will be responsible for this initiative.

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Recommendation 2. Discontinue leasing Powered Industrial Vehicles by Quarter 2, FY 2009. This could produce a savings of \$11,535 over 2 years.

Response: Management agrees with this recommendation. As of 11/12/08, there are no leased Powered Industrial Vehicles in the Louisville Processing and Distribution Center and leasing will not be considered as an option at the P&DC. William Bartley, Maintenance Manager will be responsible for this initiative.

Recommendation 3. Reduce industrial vehicle inventory by two by the end of FY 2009.

Response: Management agrees with this recommendation. One vehicle will be retired during Quarter 2 of FY 09, and the second vehicle will be retired during Quarter 3 of FY 09, thus reducing industrial vehicle inventory by 2 by 9/30/2009. Steve Mueller, Manager In Plant Support (Acting) will be responsible for this initiative.

Recommendation 4. Provide PIVMS training to all employees who need to use the system by Quarter 2, 2009.

Response: Management agrees with this recommendation. All current SDO's, MDO's and Mail Handlers will receive either initial training or re-training no later than March 31, 2009. Jack Murphy, Senior OSS (Acting) will be responsible for this initiative.

I do not believe that this statement contains any other information that may be exempt for the Freedom of Information Act (FOIA).

Respectfully submitted,



Theresa Bachman
Senior Plant Manager, Louisville KY P&DC

cc: Katherine Banks
cc: Anthony M Pajunas
cc: David E Williams, Jr
cc: Clovis L Christenbury II
cc: Mark Tappe