



OFFICE OF  
**INSPECTOR  
GENERAL**  
UNITED STATES POSTAL SERVICE

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# **Washington Network Distribution Center – Postal Vehicle Service Operations**

## **Audit Report**

March 21, 2013

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Report Number NO-AR-13-001



OFFICE OF  
**INSPECTOR  
GENERAL**  
UNITED STATES POSTAL SERVICE

## **HIGHLIGHTS**

March 21, 2013

### **Washington Network Distribution Center – Postal Vehicle Service Operations**

Report Number NO-AR-13-001

#### ***BACKGROUND:***

The U.S. Postal Service transportation network comprised of Postal Service vehicles and employees is called the Postal Vehicle Service. Postal Vehicle Service operations at network distribution centers include drivers using tractors to move trailers in or around a facility yard. Processing operations require timely unloading of mail from trailers as they arrive and timely loading of mail into trailers for immediate departure to avoid unnecessary moves.

Our objectives were to assess trailer loading practices and determine whether staffing of Postal Vehicle Service driver operations was efficient, effective, and economical. This report focuses on the Washington Network Distribution Center, which has 12 Postal Vehicle Service drivers who move about 1,611 trailers per week.

#### ***WHAT THE OIG FOUND:***

Washington Network Distribution Center staff effectively unloaded mail from trailers as they arrived but did not always follow policy to effectively load trailers for immediate movement from the facility, resulting in unnecessary trailer yard moves. We also found drivers performed an average of 27 trailer moves daily rather than the standard 40 because management did not fully assess workload and staffing requirements. As a result, more driver workhours were expended than

necessary. We estimate the Postal Service could reduce 3,492 workhours and save about \$271,000 annually if standards are met. We also determined the Postal Service was not always conducting required annual reviews and was paying for unneeded trips. We estimate the Postal Service could eliminate or modify 60 highway contract trips for a savings of about \$2.1 million annually. Finally, we observed Postal Vehicle Service drivers not wearing safety belts and some facility doors not operating properly or being kept open.

#### ***WHAT THE OIG RECOMMENDED:***

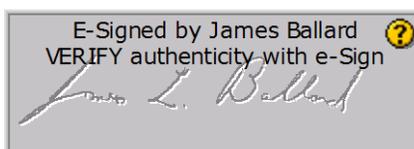
We recommended the vice president, Capital Metro Area Operations, ensure that Washington Network Distribution Center managers follow prescribed standard operating procedures for loading mail into trailers; periodically assess driver workload and staffing to ensure compliance with trailer move standards; and eliminate 3,492 annual workhours. We also recommended management follow prescribed procedures for making highway contract routes efficient and verify eliminating or modifying 60 trips identified during our audit; and emphasize and enforce that drivers wear safety belts, repair exterior doors' badge readers and locks, and ensure that exterior doors are not left open.

[\*Link to review the entire report\*](#)



March 21, 2013

**MEMORANDUM FOR:** DAVID C. FIELDS  
VICE PRESIDENT, CAPITAL METRO AREA OPERATIONS



**FROM:** *for*  
Robert J. Batta  
Deputy Assistant Inspector General  
for Mission Operations

**SUBJECT:** Audit Report – Washington Network Distribution  
Center – Postal Vehicle Service Operations  
(Report Number NO-AR-13-001)

This report presents the results of our audit of the Washington Network Distribution Center – Postal Vehicle Service Operations (Project Number 12XG008NL002).

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

Attachments

cc: David E. Williams, Jr.  
Mary T. Taylor  
Pamela S. Grooman  
Corporate Audit and Response Management

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## Introduction

This report focuses on Washington Network Distribution Center (NDC) Postal Vehicle Service (PVS) driver operations and related trailer loading (and unloading) practices (Project Number 12XG008NL002). The objectives of our audit were to assess loading practices at selected NDCs and determine whether staffing of PVS transportation operations was efficient, effective, and economical. This self-initiated audit addresses operational risk. See [Appendix A](#) for additional information about this audit.

U.S. Postal Service network transportation using Postal Service vehicles and employees is referred to as PVS. Because PVS operations are local, they are managed at the facility level under guidance from district, area, and headquarters transportation officials. PVS activities at NDCs include yard operations, which is the movement of trailers and equipment in or around a facility yard (spotting), typically to and from the facility dock doors. PVS drivers move trailers using spotter trucks<sup>1</sup> (see Figure 1).

**Figure 1. Spotter Trucks at Washington NDC**



Source: U.S. Postal Service Office of Inspector General (OIG), August 16, 2012.

NDCs are tasked with ‘live unloading’ and ‘live loading’ of all arriving and departing mail transportation trailers. Live unloading is when the highway contract route (HCR) or PVS driver brings a trailer directly to a dock door for unloading when it enters the facility, and live loading is when the HCR or PVS driver takes a loaded trailer directly from the dock door and out of the facility yard. In either case, the trailer is not placed (or spotted) in the yard for movement at a later time. Not spotting trailers in the yard ensures that mail flows to the next operation or facility without delay and reduces total operating expenses

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<sup>1</sup> Spotters are heavy duty trucks used to move trailers within an NDC yard operation.

at the same time.<sup>2</sup> The Washington NDC has 12 PVS drivers responsible for an average of 1,611 trailer moves per week, servicing 144 dock doors.

## Conclusion

Washington NDC officials could more effectively manage trailer loading practices, increase staffing efficiency for PVS spotter truck operations, and reduce unnecessary driver workhours. We found that management did not consistently follow the ‘live loading’ policy for outbound trailers when possible. Specifically, PVS drivers were spotting some trailers in the yard for subsequent movement from the facility instead of moving trailers directly from the dock door and out of the facility yard.

For the remaining necessary trailer moves, managers did not require PVS drivers to adhere to the productivity standards of 40 trailer moves in the yard per day. We found that drivers performed an average of 27 trailer moves per day. As a result, the Washington NDC expended more driver workhours than necessary. We estimate the Postal Service could reduce driver workhours by 3,492 and save about \$271,000 annually if standards were met.

During our review, we also determined the Postal Service was not effectively managing some HCR transportation to and from the Washington NDC and was paying for unneeded trips. We estimate the Postal Service could eliminate or modify 60 highway contract trips for a savings of about \$2.1 million annually. Finally, we observed some PVS drivers were not wearing safety belts while driving in the Washington NDC yard and that some doors to the facility were not operating properly or were inappropriately kept open at times.

## Live Unloading/Loading Practices

As required, the Washington NDC staff was effectively unloading inbound mail from trailers as they arrived at the facility yard. However, staff was not always loading trailers for immediate movement from the dock doors and out of the facility yard. Instead, in some instances, PVS drivers moved trailers back to the yard; therefore, the Washington NDC was conducting more spotter moves than necessary. This occurred because management was not always enforcing Postal Service policy where possible for dispatching vehicles. The policy requires that all dispatches be ‘live loaded.’

In our analysis, we noted some constraints at the facility that reduced opportunities for live loading. Specifically, management could not always adhere to the live load requirement because of limited dock space for staging mail for the live loading process. The space was limited because of the equipment needed to perform other processing operations at the facility. However, despite the space constraints, we concluded the

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<sup>2</sup> *Standard Operating Procedures Live Loading and Unloading of Trailers at Network Distribution Centers.*

Washington NDC could have live loaded about 22 percent more trips over a 1-month period than it did.<sup>3</sup> See [Appendix B](#) for our detailed analysis of this topic.

### Postal Vehicle Service Yard Move Productivity

We found that Washington NDC management could make operations more efficient by holding PVS drivers to a standard of 40 moves<sup>4</sup> per workday for each driver according to established productivity standards. The productivity standards were established in 2005 through the Postal Service's Breakthrough Productivity Initiative,<sup>5</sup> which established productivity standards for NDC PVS operations. The standards specify that drivers (tractor-trailer operators) are expected to complete 40 trailer moves within an 8 -hour period. This equates to one driver accomplishing 200 trailer moves in an NDC yard during a 40-workhour week.<sup>6</sup>

We found that Washington NDC PVS drivers averaged 27 trailer moves per workday. Furthermore, we conducted observations and analyzed operational workload data<sup>7</sup> and confirmed that the established productivity standards of 40 moves per day were reasonable and attainable for PVS drivers at the Washington NDC. We found that productivity standards were not met because Washington NDC managers did not fully assess workload and staffing requirements. If productivity was set at the standard of 40 moves per day, the Capital Metro Area could phase out about 3,492 annual workhours and save about \$271,000 See [Appendix C](#) for our detailed analysis of this topic.

### Inefficient Highway Contract Routes

During our review, we also found that some HCR trips to and from the Washington NDC were not efficient and that 60 trips could be consolidated and/or eliminated due to low mail volume. This occurred because management was not always conducting required schedule and vehicle utilization reviews<sup>8</sup> in order to adjust trips to account for the lower volumes. By making these changes, the Washington NDC could save more than \$2.1 million annually. We also determined the Postal Service could change these trips without negatively affecting on-time service. During the course of our audit, the Capital Metro Area initiated the modification or elimination of 24 trips of the 60 trips identified in our audit. See [Appendix D](#) for our detailed analysis of this topic.

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<sup>3</sup> No monetary savings will be claimed regarding live loading. The 22 percent of trips that could have been live loaded over 1 month is less than one employee's workload; however, management should consider the reduced moves in future workload and staffing analyses and reduce workhours as necessary.

<sup>4</sup> A move consists of moving trailers and equipment from one location to another in the NDC yard.

<sup>5</sup> The breakthrough productivity initiative was initiated to drive costs out of the Postal Service while creating continuous improvement capability.

<sup>6</sup> Headquarters and senior area transportation managers have explained that this productivity standard was reasonable and appropriate.

<sup>7</sup> Our analysis also included PVS driver workload associated with the Surface Transfer Center (STC), which is located in the NDC facility and is supported by the drivers.

<sup>8</sup> Handbook PO-701, *Fleet Management*, Chapter 23, dated March 1991, requires PVS operations to perform vehicle utilization reviews at least annually to maintain efficiency.

## Safety and Security Concerns

During our fieldwork, we observed that some PVS drivers were not wearing safety belts while driving in the Washington NDC yard as required and we shared this information with management during our review. This occurred because management was not always enforcing required policy. Postal Service policy states that “Drivers must wear safety belts whenever the vehicle is in motion.” Therefore, management needs to consistently reinforce Postal Service policy on safety belt use. See [Appendix E](#) for our detailed analysis of this topic.

We also observed that some of the exterior doors to the Washington NDC were left open by shoring straps<sup>9</sup> or other means and that other doors were accessible without the use of a security badge or key. We determined this occurred because management did not follow Postal Service policy requiring that doors must not be disabled or propped open. See [Appendix E](#) for our detailed analysis of this topic.

## Recommendations

We recommend the vice president, Capital Metro Area Operations, require that Washington Network Distribution Center management:

1. Follow prescribed Postal Service standard operating procedures to the extent possible for live loading mail into trailers for immediate movement from the facility yard and consider the reduction of moves in future workload and staffing analyses.
2. Periodically assess Postal Vehicle Service truck driver workload and staffing requirements with respect to productivity standards to maintain appropriate staffing levels.
3. Eliminate 3,492 annual workhours associated with improving Postal Vehicle Service truck driver productivity to the Breakthrough Productivity Initiative standard of 40 moves per day, or 200 moves per week.
4. Ensure managers within the Capital Metro Area follow prescribed highway contract procedures for making highway contracts efficient, including the continual monitoring and adjustment of trips based on need.
5. Verify the elimination or modification of 24 trips from highway contracts initiated by management during our audit for a savings of about \$800,000 annually.
6. Eliminate or modify 36 trips from highway contracts identified during our audit for a savings of about \$1.3 million annually.

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<sup>9</sup> Shoring straps, also called restraining straps, are used to secure containers of mail in a trailer.

7. Continually re-emphasizes the safety policy that drivers must wear safety belts whenever their vehicles are in motion and provide management oversight for enforcement.
8. Ensure Postal Service management repair exterior doors that have broken locks and security badge readers that do not operate and hold safety talks with all employees to highlight that security policy states exterior doors are not to be propped open with any devices to bypass security.

### **Management's Comments**

Management generally agreed with our overall findings and recommendations 1, 2, 4, 5, 7 and 8. Management partially disagreed with recommendations 3 and 6.

Regarding recommendation 1, management stated that they already increased live loading for three daily trips and are altering door assignments that will allow for additional live loading improvements going forward. In response to recommendations 2 and 4, management stated that they recently filled the transportation manager position that was vacant, and the new manager is currently reviewing and adjusting PVS schedules as necessary to ensure they are properly reviewed and efficient. In addition, the plant manager will provide oversight to ensure that at least annual audits are conducted and that opportunities to capture workhour savings are realized going forward.

With respect to recommendation 3, management agreed with the finding but was not in full agreement with the recommendation. Management stated that one position has been reverted for a savings of 2,000 hours out of the 3,492 recommended in the report, but the additional workload gained from the Area Mail Processing study of the Suburban Processing and Distribution Center Annex will require additional workhours at the facility. Management estimated that with the additional workload and 2,000 workhours, they have achieved a savings of 4,000 hours to date.

In response to recommendation 5, management stated that they have adjusted the routes as identified during the audit for an estimated savings of \$1.8 million.

Regarding recommendation 6, management did not fully agree with the recommendation stating that they could not eliminate all trips that the OIG recommended. Management stated while there are savings to be realized, it would not be cost effective to eliminate a round trip and replace it with a one-way trip, even though the data suggest otherwise. Management provided examples of these situations. However, in their response, management provided some alternate trips for elimination other than the ones recommended. Management stated they have eliminated a total of 49 trips to date.

In response to recommendation 7, management stated that they issued a safety talk to drivers on the requirement of wearing safety belts and will conduct on the spot inspections to ensure compliance by drivers. Finally, in response to recommendation 8, management stated that the Inspection Service and the Facility Service Office are addressing the doors and entry systems issues. Management sent a letter to all employees regarding the security concerns and have posted signs to enforce policy. See [Appendix G](#) for management's comments in their entirety.

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

The OIG considers management's comments responsive to the recommendations and corrective actions should resolve the issues identified in the report. The OIG acknowledges management's comments regarding recommendations 3 and 6. Regarding recommendation 3, once the additional workload is finalized, management will have a better assessment as to how many additional moves will be needed. At that point, they can provide documentation, and the OIG will consider that information in closing the significant recommendation. Likewise, regarding recommendation 6, after all 49 service changes are finalized, management can provide the OIG with documentation of all service change requests. The information will be analyzed to determine what savings were achieved compared to what was recommended. If other trips were substituted for the ones the OIG recommended, those will also be considered in our analysis.

The OIG considers all the recommendations 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 Postal Service's follow-up tracking system until the OIG provides written confirmation that the recommendations can be closed.

## Appendix A. Additional Information

### Background

PVS Operations. Postal Service network transportation that uses Postal Service vehicles and employees is called PVS. Management typically assigns PVS vehicles and personnel to Postal Service network facilities, such as NDCs or processing and distribution centers (P&DC) in or near metropolitan areas. PVS operations typically include yard operations in which spotter trucks move or ‘spot’ trailers and equipment in or around a facility yard, typically an NDC yard (see Figure 2). PVS is capital-and personnel-intensive. Nationwide, PVS capital assets include about 1,943 cargo vans, 2,166 tractors (including spotter tractors), and 3,826 trailers. The Postal Service has about 6,600 PVS drivers. The American Postal Workers Union represents PVS drivers and support personnel.

The Washington NDC has 12 drivers responsible for an average of 1,611 trailer moves per week. These drivers service 144 dock doors at the Washington NDC and this includes moves for the STC, which is in the same facility.

**Figure 2. Spotter Truck Moving Trailer in the Washington NDC Yard**



Source: OIG photo taken August 15, 2012.

Live Loading and Unloading Process. An essential component of the NDC network is the live unloading of trailers as they arrive at the facility and the live loading of trailers for direct movement from the facility yard.<sup>10</sup> This process avoids unnecessary movement and placement (spotting) of trailers in the yard and reduces overall transportation time and handling costs. Outgoing mail received at Tier 1 NDCs from

<sup>10</sup> *Service Talk #2 Live Loading and Unloading of Trailers at Network Distribution Centers* – service talk used to communicate information on the conversion of bulk mail centers into NDCs to NDC employees. It explains that an essential component of this new NDC network is the live loading and unloading of trailers as they arrive at the facility and identifies specific roles and responsibilities.

local processing facilities is containerized separately and must be unloaded and transferred to the Tier 2 NDC in time to be processed and dispatched into the network.<sup>11</sup> This requires the live unloading of originating trailers and the live loading of trailers for the Tier 2 NDCs. Queuing and staging trailers for unloading at a later time may result in delays and service failures.

### Objectives, Scope, and Methodology

The objectives of our audit were to assess loading practices at selected NDCs and determine whether staffing of PVS transportation operations was efficient, effective, and economical. During our work, we interviewed Postal Service officials at headquarters and the Washington NDC. We reviewed relevant Postal Service policies and procedures, interviewed managers and employees, and observed and photographed operations.

We extracted reports from the Yard Management System (YMS)<sup>12</sup> that detailed all outbound dispatches at the Washington NDC for a 4-week period. We analyzed this data to determine whether the facility had further opportunity to live load its outbound dispatches. We based this analysis on the Postal Service's *Standard Operating Procedures Live Loading and Unloading of Trailers at Network Distribution Centers* policy. We also obtained computer-generated data from the Vehicle Tracking Analysis and Performance System (VTAPS)<sup>13</sup> and YMS for a consecutive 35-week period from November 1, 2011 through June 30, 2012 showing the PVS yard operational workload (moves) for Washington NDC operations at the facility. We identified 43,618 yard moves during the period under study. Because the YMS data did not include yard moves performed for the STC, which is in the Washington NDC facility and is supported by the Washington NDC drivers, we incorporated manual records obtained from the Washington NDC transportation manager. The manual records started on August 16, 2012 and continued for 8 weeks. For the period reviewed, we combined the moves performed for the Washington NDC and the STC. We examined this workload with previously established Postal Service productivity standards of 40 moves per day for PVS spotter driver operations.

While conducting observations of loading and unloading practices at the Washington NDC, we observed multiple HCR trips with less than full trailer loads of mail departing for the same destinations. We extracted reports from the Transportation Contract Support System (TCSS)<sup>14</sup> that detailed highway contract activity for the Washington NDC. We analyzed this data to determine the number of trips that went to each

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<sup>11</sup> Tier 1 sites distribute local and destination Standard Mail, Periodicals, and Package Services for the Tier 1 service area. Tier 2 sites include Tier 1 responsibilities and the distribution of outgoing Standard Mail, Periodicals, and Package Services for assigned Tier 1 sites.

<sup>12</sup> An automated system that tracks vehicles through a facility yard.

<sup>13</sup> VTAPS manages vehicle operations by providing real-time actionable information, effective vehicle tracking and control utilities, and flexible access to data required to evaluate and improve vehicle operations. Interface will provide times schedule, drop ship, and times data for use in VTAPS.

<sup>14</sup> TCSS is used to manage transportation contracts and related activities by allowing contracting officials to solicit, award, and administer transportation contracts.

destination. We also extracted historical volume reports from the Transportation Information Management System (TIMES)<sup>15</sup> to obtain trailer utilization (mail volume) data for the Washington NDC's inbound and outbound HCRs. We totaled mail volumes for all trips to each destination and compared it to the number of trips going to each destination. If a destination had more trips than were needed based on mail volume, we recommended that trips to that destination be modified or eliminated.

We assessed the reliability of YMS and VTAPS data and validated data from YMS as they pertained to spotter moves in the yard at the Washington NDC. We observed spotters moving trailers within the yard and compared those to the YMS spotter move report for the same period. We concluded the data were accurate and reliable. We also verified the accuracy of the data through discussions with Postal Service officials knowledgeable about the data and the system that produced the data. We determined that the data were sufficiently reliable for the purposes of this report.

We conducted this performance audit from July 2012 through February 2013 in accordance with generally accepted government auditing standards and included such tests of internal controls as we considered necessary under the circumstances. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that 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 February 4, 2013, and included their comments where appropriate.

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<sup>15</sup> TIMES allows the dock clerk to collect data about the arrival and departure of mail truck transportation and to communicate that information to other Postal Service processing facilities.

Prior Audit Coverage

Report Title	Report Number	Final Report Date	Monetary Impact
<i>St. Louis Network Distribution Center – Postal Vehicle Service Operations</i>	NL-AR-12-008	9/21/2012	\$598,948
<p><b>Report Results:</b> The OIG identified 6,984 unnecessary workhours and had an agreement from the St. Louis NDC to phase out the workhours. NDC managers need to periodically assess PVS workload and staffing requirements to maintain appropriate staffing levels. In addition, management should re-emphasize the safety policy on the use of safety belts while a vehicle is in motion. Management generally agreed with our findings and recommendations.</p>			
<i>Atlanta Network Distribution Center – Postal Vehicle Service Operations</i>	NL-AR-12-007	7/24/2012	\$694,105
<p><b>Report Results:</b> The OIG identified 8,714 unnecessary workhours. Management should eliminate 6,968 workhours, and NDC managers need to periodically assess PVS workload and staffing requirements. Also, management should eliminate an additional 1,746 workhours by following prescribed standard operating procedures for movement of trailers in the yard to maintain appropriate staffing levels. Management generally agreed with our findings and recommendations.</p>			
<i>Postal Vehicle Service Transportation Routes – Washington Network Distribution Center</i>	NL-AR-10-007	8/4/2010	\$2,791,349
<p><b>Report Results:</b> The OIG identified 6,968 unnecessary workhours and had agreement from the Washington NDC to phase out the workhours. In addition, NDC managers need to periodically assess PVS workload and staffing requirements to maintain appropriate staffing levels. Management agreed with our findings and recommendations.</p>			

## Appendix B: Detailed Analysis of Live Loading Practices

We observed and analyzed the Washington NDC's ability to perform required live unload and load procedures. We determined that management was live unloading according to policy; however, management was not always live loading according to policy. We found that although management could not fully perform the live load requirements because of other processing operations at the facility,<sup>16</sup> it did have an opportunity to live load an additional 22 percent of the trailers as shown in [Table 1](#).

Specifically, after conducting our observations at the Washington NDC, we determined that because of the layout of the facility and space needed to process other mail, the only dock doors that could accommodate 'live loading' were dock doors 127 through 144. To analyze loading activity, we extracted a historical outbound trip report from YMS that detailed all of the outbound dispatches being made by the facility for a 4-week period to determine whether trips could be live loaded given time constraints. We also obtained the spotter activity archive report for the same period from YMS. Using these reports, we compiled a trips list and sorted by dock door to determine when trailers were departing from a specific door and the new location of the trailers. If there was more than 1 hour between trips leaving from the same door, we determined the trips were candidates for live loading. We then considered other factors, including the percentage of load on each trip, dock space for staging mail for subsequent trips, and location of move.

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<sup>16</sup> The Washington NDC is a hybrid Tier 1 facility because it processes trayed mail, which is generally processed by Tier 2 facilities. Tier 1 sites process designating mail and originating turn-around mail for the Tier 1 service area. All mail for destinations outside of the Tier 1 service area are sent to Tier 2 sites for processing and dispatch. Tier 2 sites process their own inbound and outbound mail plus all of the outgoing mail from Tier 1 sites. Tier 2 sites may perform single piece distribution of letters and flats and containerize and dispatch First-Class™ and Priority Mail. Tier 3 sites are the gateway for consolidating mail from the Tier 2 sites when the Tier 2 sites are not able to send out full truckloads to the network.

**Table 1. Washington NDC Outbound Trip (Live Load) Analysis**

<b>Date</b>	<b>Total Trips</b>	<b>Trips that Could Be Live Loaded</b>
8/25/2012	14	6
8/26/2012	5	1
8/27/2012	16	2
8/28/2012	19	4
8/29/2012	18	6
8/30/2012	19	4
8/31/2012	17	5
9/1/2012	13	1
9/2/2012	5	0
9/3/2012	11	3
9/4/2012	15	5
9/5/2012	17	4
9/6/2012	17	5
9/7/2012	17	3
9/8/2012	13	1
9/9/2012	5	1
9/10/2012	17	4
9/11/2012	15	1
9/12/2012	18	3
9/13/2012	17	5
9/14/2012	16	2
9/15/2012	13	2
9/16/2012	5	0
9/17/2012	17	5
9/18/2012	18	3
9/19/2012	16	2
9/20/2012	18	5
9/21/2012	17	8
<b>Total Outbound Trips</b>	<b>408</b>	N/A
<b>Total Potential Live Loads Identified in 4 Weeks</b>	N/A	<b>91</b>
<b>Percentage of Trips with Potential to be Live Loaded</b>	N/A	<b>22%</b>

Source: Postal Service, YMS Outbound Trip Status Reports, as of September 21, 2012.

### Appendix C: Detailed Analysis of Tractor Trailer Operator Work Load

The Washington NDC has 12 PVS drivers over three tours who are responsible for moving trailers around the Washington NDC yard. The work includes movement of trailers for operations of the NDC, as well as, operations associated with the STC, which is at in the same facility.

We reviewed all yard moves associated with the NDC operations in a 7-month period from November 1, 2011 to June 30, 2012. We examined 43,618 yard moves over 174 days. We also reviewed yard moves tracked manually for the STC for an 8-week period from August 16 to October 15, 2012. We determined that each driver moved an average of 27 moves per day or 134 moves per week. The national standard for yard moves is 40 moves per day or 200 moves per week (see Table 2).

**Table 2. Average Moves Per Driver Per Day**

Facility	Average Weekly Moves	Drivers	Average Moves Per Driver Per Week	Average Moves Per Driver Per Day
Washington NDC	1,611	12	134	27

Source: Postal Service, VTAPS, YMS, and manual reports from the Washington NDC, as of October 15, 2012.

### Appendix D: Detailed Analysis of Cost Reductions for Highway Contract Routes

While observing loading and unloading practices at the Washington NDC, we noted multiple HCR trips with less than full trailer loads of mail departing for the same destinations. We reviewed reports that detailed highway contract activity for the Washington NDC to determine the number of trips that went to each destination. We also extracted historical volume reports to obtain trailer utilization (mail volume) data for the Washington NDC’s inbound and outbound HCRs. We totaled the mail volumes for all trips to each destination and compared the total to the number of trips going to each destination. We found that HCR trips to and from the Washington NDC were not efficient and that some trips could be consolidated or eliminated without negatively impacting on-time service due to low volume. If a destination had more trips than were needed based on the mail volume, we recommended trips to that destination be modified or eliminated. See Table 3 for the inbound trip analysis and Table 4 for the outbound trip analysis.

**Table 3. Washington NDC Inbound Trip Analysis**

Facility	Total Number of Inbound Trips	Total Average Volume of Inbound Trips <sup>17</sup>	Total Inbound Trips Needed Based on Average Volume	Number of Inbound Trips to Eliminate	HCRs with Trips to Facility
Baltimore International Mail Facility (IMF), MD	6	264%	4	2	20291
Baltimore P&DC, MD	9	670%	8	1	20291
Charlottesville Main Post Office (MPO), VA	3	158%	3	0	230M2
Dulles P&DC, VA	6	407%	5	1	20111
Eastern Shore Processing & Distribution Facility (P&DF), MD	5	253%	4	1	21892
Greensboro NDC, NC	21	1718%	18	3	208L5, 27416
Norfolk P&DC, VA	5	295%	4	1	23390
Northern VA P&DC, VA	10	689%	8	2	220U0, 23390 20111, 226JV
Richmond P&DC, VA	12	714%	8	4	23090, 32212, 23891
Suburban P&DC, MD	9	313%	4	5	202U1, 207TE
<b>Total</b>	<b>86</b>		<b>66</b>	<b>20<sup>19</sup></b>	<b>NA</b>

Source: OIG, TCSS, and TIMES, as of November 27, 2012.

<sup>17</sup> The total average volume of inbound trips was calculated by combining the average volumes for all trips from each facility arriving at the Washington NDC. For example, one facility may have three trips going to the Washington NDC all with the average volume of 70 percent. The total average volume in this example would be 210 percent.

**Table 4. Washington NDC Outbound Trip Analysis**

Facility	Total Number of Outbound Trips	Total Average Volume of Outbound Trips <sup>18</sup>	Total Outbound Trips Needed Based on Average Volume	Number of Outbound Trips to Eliminate	HCRs with Trips to Facility
Baltimore IMF, MD	8	507%	6	2	20291
Baltimore P&DC, MD	12	920%	10	2	208L5, 20291, 21892
Charlottesville MPO, VA	3	84%	2	1	230M2
Dulles P&DC, VA	10	802%	9	1	20111, 208L5
Eastern Shore P&DF, MD	7	Unknown	Unknown	0	21892
Greensboro NDC, NC	14	1072%	12	2	27418, 50319, 75116, 15118, 274Y1, 27416, 32212
Norfolk P&DC, VA	7	371%	5	2	23390
Northern VA P&DC, VA	15	1155%	13	2	208L5, 220U0
Richmond P&DC, VA	16	910%	10	6	23090, 32212, 23390, 23891
Suburban P&DC, MD	5	442%	5	0	202U1, 208L5
<b>Total</b>	<b>97</b>		<b>72</b>	<b>18<sup>19</sup></b>	N/A

Source: OIG, TCSS, and TIMES, as of November 27, 2012.

We also noted that during our audit, the Capital Metro Area modified or eliminated 24 trips to and from the Washington NDC. These changes led to a reduction of more than 500,000 miles a year and an annual savings of more than \$800,000 (see [Table 5](#)).

<sup>18</sup> The total average volume of outbound trips was calculated by combining the average volumes for all trips leaving the Washington NDC destined for the same facility. For example, three trips may leave the Washington NDC going to the same facility all with the average volume of 70 percent. The total average volume in this example would be 210 percent

<sup>19</sup> There are 38 trips recommended for elimination here because HCR schedule 208L5 trips 24 and 30 have an inbound trip from Greensboro and an outbound trip to Northern VA that were counted separately in this chart because this analysis is based on facility trips and not trip number. When referring to the number of trips recommended for elimination elsewhere in the report, trips 24 and 30 were counted once each reducing the number to 36.

**Table 5. Postal Service-Initiated Changes**

<b>Contract Number</b>	<b>Number of Trips Modified<sup>20</sup></b>	<b>Annual Mileage Reduced</b>	<b>Annual Savings</b>
20636	5	-49,673	-\$89,268
217Y1	2	48,314	80,291
23090	3	255,056	386,883
23390	5	87,802	169,242
27416	3	83,224	139,398
274Y1	6	78,958	131,427
<b>Total</b>	<b>24</b>	<b>503,681</b>	<b>\$817,973</b>

Note: We included only trips with at least one stop at the Washington NDC in this analysis.

Source: OIG, TCSS, and the Postal Service, as of December 13, 2012.

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<sup>20</sup> In this analysis, any trip that was added, eliminated, or had a change in mileage, frequency, or facility stops was considered to be modified.

## Appendix E: Detailed Analysis of Safety and Security Concerns

### Safety Belt Usage

On August 15, 2012, we observed PVS drivers in the Washington NDC yard to determine whether they were wearing safety belts as required. Of the four PVS drivers observed, none were wearing safety belts. We shared this information with management during our review. Postal Service policy states that “Drivers must wear safety belts whenever the vehicle is in motion.” Therefore, management needs to consistently reinforce Postal Service policy on safety belt use.

### Plant Security Review

During the week of August 14, 2012, we opened some Washington NDC exterior doors without a security badge. We notified management of the issue and stated that we would check the doors during our next facility visit. We returned to the Washington NDC on September 11, 2012, and determined that Washington NDC management did not correct the deficiency noted in our earlier visit. In fact, we were able to gain access to 12 of the 14 exterior doors without using a security badge or key due to broken door locks, security badge readers not working properly, and employees using shoring straps (ordinarily used to secure a load of equipment in a truck) to prop doors open. See Figure 3 for examples of shoring straps either draped over a badge reader to keep the door propped open or propping open a door to the facility.

**Figure 3. Doors Propped Open with Shoring Straps at Washington NDC**



Source: OIG photograph, September 11, 2012.



Source: OIG photograph, September 11, 2012.

### Appendix F: Monetary Impacts

We concluded that Washington NDC management could phase out 3,492 workhours by following established productivity standards. This would save the Postal Service \$271,075 annually (\$542,150 over 2 years). The Postal Service initiated the modification or elimination of 24 HCRs trips during our audit saving the Postal Service \$817,973 annually (\$1,635,946 over 2 years). We also concluded that the Washington NDC could modify or eliminate an additional 36 HCR trips based on the volume of mail and frequency of trips. These changes would save the Postal Service \$1,294,547 annually (\$2,589,094 over 2 years). The total HCR savings would be \$2,112,520 annually (\$4,225,040 over 2 years). See Table 6.

**Table 6. Potential Savings – Funds Put to Better Use<sup>21</sup>**

Recommendation	Impact Category	Amount
2	Funds Put to Better Use	\$542,150
5	Funds Put to Better Use	1,635,946 <sup>22</sup>
6	Funds Put to Better Use	2,589,094 <sup>23</sup>
<b>Total</b>		<b>\$4,767,190</b>

Source: OIG, as of December 13, 2012.

<sup>21</sup> Impact Category: Funds that could be used more efficiently by implementing recommended actions.

<sup>22</sup> Estimated savings are based on the annual rate of existing contracts and are negotiated between the Postal Service and their suppliers.

<sup>23</sup> To be fiscally conservative, the OIG used HCR trips with the smallest service frequency when calculating the monetary savings. Estimated savings are based on the annual rate of existing contracts and are negotiated between the Postal Service and their suppliers.

## Appendix G: Management's Comments

AREA VICE PRESIDENT  
CAPITAL METRO AREA OPERATIONS



March 12, 2013

Judith Leonhardt, Director - Audit Operations  
Office of Inspector General, United States Postal Service  
1734 North Lynn Street  
Arlington, VA 22209-2020

SUBJECT: Washington Network Distribution Center – Postal Vehicle Service Opns  
Draft Audit Report (Report Number NL-AR-13-DRAFT)

Thank you for the opportunity to review and comment on the subject draft audit report. Management appreciates the efforts the Office of Inspector General (OIG) has taken in regards to Postal vehicle service operations at the Washington Network Distribution Center.

Please find attached Capital Metro Area's response to the OIG's recommendation to include action plans, target implementation dates, responsible officials, and cited supporting documentation.

Please feel free to contact my office with any questions or concerns regarding this response package.

A handwritten signature in black ink, appearing to read "D. Fields", written over the printed name.

David C. Fields  
Vice President, Operations  
Capital Metro Area

cc: David E. Williams, Jr.  
Mary T. Taylor  
Pamela S. Grooman  
Corporate Audit and Response Management

MAILING ADDRESS:  
16501 SHADY GROVE ROAD  
GAITHERSBURG MD 20898-9998  
301-548-1410  
FAX: 301-548-1434



March 12, 2013

JUDITH LEONHARDT  
DIRECTOR, AUDIT OPERATIONS  
OFFICE OF THE INSPECTOR GENERAL

SUBJECT: WASHINGTON NETWORK DISTRIBUTION CENTER- POSTAL  
VEHICLE SERVICE OPERATIONS REPORT NUMBER NL-AR-13-DRAFT  
MANAGEMENT RESPONSE

Thank you for the opportunity to respond to the recommendations from your Washington NDC- Postal Service Operations Audit. The audit team provided a thorough and convincing report based on the reviews conducted. Management generally agrees with the recommendations made and agrees with the monetary impacts as well unless otherwise addressed in the specific management response.

**RECOMMENDATION # 1**

Follow prescribed Postal Service standard operating procedures to the extent possible for live loading mail into trailers for immediate movement from the facility yard and consider the reduction of moves in future workload and staffing analyses.

**MANAGEMENT RESPONSE/ ACTION PLAN**

The Capital Metro Area is in agreement with the audit finding and recommendation that live loading as outlined in Appendix B can be increased on docks 127 - 144. Since the audit was conducted an additional 3 trips daily are being live-loaded. Adjustments currently being developed by the local TAN's Manager to alter door assignments will result in additional improvements in live-loading vehicles going forward.

**TARGET IMPLEMENTATION DATE**

March 2013

**RESPONSIBLE OFFICIAL**

Washington NDC TANS Manager

**RECOMMENDATION # 2**

Periodically assess Postal Vehicle Service truck driver workload and staffing requirements with respect to productivity standards to maintain appropriate staffing levels.

**MANAGEMENT RESPONSE/ ACTION PLAN**

The Capital Metro Area is in agreement with the audit finding and recommendation. Prior to January 2013 there was no dedicated Transportation Manager for the Washington NDC, resulting in insufficient oversight of the operation. As a result of the recent restructuring of NDC administrative staff positions, Washington NDC was awarded a Transportation Manager position which was filled not long after this audit was conducted. The newly assigned manager is currently reviewing and adjusting PVS schedules as required of the position. The Washington NDC Plant Manager will assure that annual audits at minimum are conducted by the TAN's Manager and his staff to ensure opportunities to capture workhour savings are captured henceforth.

**TARGET IMPLEMENTATION DATE**

April 2013

**RESPONSIBLE OFFICIAL**

Washington NDC TANS Manager

**RECOMMENDATION # 3**

Eliminate 3,492 annual workhours associated with improving Postal Vehicle Service truck driver productivity to the Breakthrough Productivity Initiative standard of 40 moves per day, or 200 moves per week.

**MANAGEMENT RESPONSE/ ACTION PLAN**

The Capital Metro Area is in agreement with the audit finding; however is not fully in agreement with the recommendation. Since this audit was conducted, one TTO position was vacated and reverted, resulting in a savings of 2000 hours towards the audit recommendation of 3492 hours. Also in that time span, the Washington NDC absorbed additional workload resulting from the AMP of an APBS processing operation from the Suburban P&DC Annex to the Capital Beltway facility. This processing shift has added 2 daily round trips to the THS operations at BWI airport totaling 4 hours daily, and 10 to 12 additional TTO moves from the Capital Beltway facility to the NDC and Southern MD Plant. With only 50% of the projected volume moved to this point, it is anticipated that the additional workload will increase in the final phase of the project. The current additions equate to an additional 2000 hours annually for a total 4000 hours savings to date.



**TARGET IMPLEMENTATION DATE**

February 2013

**RESPONSIBLE OFFICIAL**

Washington NDC TANS Manager

**RECOMMENDATION # 4**

Ensure managers within the Capital Metro Area follow prescribed highway contract procedures for making highway contracts efficient, including the continual monitoring and adjustment of trips based on need.

**MANAGEMENT RESPONSE/ ACTION PLAN**

The Capital Metro Area is in agreement with the audit finding and recommendation. Prior to January 2013 there was no dedicated Transportation Manager for the Washington NDC, resulting in insufficient oversight of the operation. As a result of the recent restructuring of NDC administrative staff positions, Washington NDC was awarded a Transportation Manager position which was filled not long after this audit was conducted. The newly assigned manager is currently reviewing and adjusting HCR schedules as required of the position. The Washington NDC Plant Manager will assure that annual audits at minimum are conducted by the TAN's Manager and his staff to ensure opportunities to capture 3P savings are captured henceforth.

**TARGET IMPLEMENTATION DATE**

May 2013

**RESPONSIBLE OFFICIAL**

Washington NDC TANS Manager

**RECOMMENDATION # 5**

Verify the elimination or modification of 24 trips from highway contracts initiated by management during our audit for a savings of about \$800,000 annually.

**MANAGEMENT RESPONSE/ ACTION PLAN**

The Capital Metro Area is in agreement with the audit finding and recommendation. Updates on the transportation reductions discussed during the audit are as follows:

- 20636 - this is an AO contract assigned to the Southern MD P&DC and currently under review
- 217Y1 - SCR ordered in 10/20/12 estimated savings \$84,033
- 23090 - SCR ordered in 10/25/12 estimated savings \$399,167
- 23390 - SCR started 11/14/12 estimated savings \$434,455
- 27416 - SCR started 9/17/12 estimated savings \$30,835
- 274Y1 - SCR ordered in 10/25/12 savings \$900,047

**Total Estimated Savings: \$1,848,537**

**TARGET IMPLEMENTATION DATE**

March 2013

**RESPONSIBLE OFFICIAL**

Washington NDC TANS Manager

**RECOMMENDATION # 6**

Eliminate or modify 36 trips from highway contracts identified during our audit for a savings of about \$1.3 million annually.

**MANAGEMENT RESPONSE/ ACTION PLAN**

The Capital Metro Area is in agreement with the audit finding; however is not in agreement with the recommendation and savings estimate. We agree that there are savings that can be captured and have eliminated 49 trips to date.

- Baltimore IMF - HCR 20291 has been eliminated. (14 trips total inbound and outbound eliminated)
- Baltimore P&DC - HCR 20291 has been eliminated (21 trips total inbound and outbound eliminated)
- Suburban MD P&DC - HCR 202U1 has been eliminated (14 trips total inbound and outbound eliminated)

In terms of the remaining opportunity, capturing these eliminations would require converting round trips to one-way trips which has not proven to be effective in generating real savings. As a result of the introduction of the NDC concept, there is a significant imbalance in cube requirements between the Washington



NDC and the P&DC's within its service area. While the NDC dispatches an average of 9-10 trips daily to the medium to large plants in the Baltimore, Capital, Northern Virginia, and Richmond Districts, these plants send their originating parcels directly to the Greensboro NDC for processing.

As a result, the outbound trips returning to Washington NDC from these plants have very little volume on them. Past attempts to convert these trips to one way trips have netted little if any savings, and the HCR suppliers will not agree to run these one way trips at the same rate as the round trip cost. Rather, they have either doubled the rate to recoup their cost for repositioning their driver and equipment for the next run, or simply refused to provide the service at the round trip rate. Likewise the same situation exists with the Washington NDC and Greensboro NDC lane.

Under the NDC concept, all destinating inter-NDC mail is routed into Greensboro for cross-docking to Washington for mail arriving as far away as Los Angeles CA. As Greensboro has more mail to transport to Washington than Washington has for Greensboro, trips departing for Greensboro will tend to be under-utilized.

To offset this imbalance, we have triangulated 19 of the trips to reposition mail transport equipment (OTR's, and APC's) from Greensboro to Washington NDC. After dropping off the MTE, these 19 trips reposition back to the P&DC's to take the next day's volume down to Greensboro. We recognize that these 19 trip alignment are not needed by the NDC, and eliminating these trips in addition to the trips already eliminated would exceed the eliminations recommended in the audit. Nonetheless, we would pay for these trips whether we put mail on them or not.

As these paid for trips offer an opportunity to advance Standard Mail into the plants for processing, we have opted to utilize them as opposed to allow them to run empty at a cost to the Postal Service. Should we be able to negotiate a cost for operating one way trips at a lowered cost than round trips, we would gladly pursue this opportunity. However as only supply management will be able to negotiate any changes, and the opportunity for substantial savings is unlikely, it is not in the interest of the Postal Service to proceed with the additional trip adjustments.

**TARGET IMPLEMENTATION DATE**

January 2013

**RESPONSIBLE OFFICIAL**

Washington NDC TANS Manager

**RECOMMENDATION # 7**

Continually re-emphasizes the safety policy that drivers must wear safety belts whenever their vehicles are in motion, and provide management oversight for enforcement.

**MANAGEMENT RESPONSE/ ACTION PLAN**

The Capital Metro Area is in agreement with the audit finding and recommendation and has issued the attached service talk to all drivers (exhibit 1). The newly assigned TAN's Manager has mandated spot inspections by the STO's on all shifts.

**TARGET IMPLEMENTATION DATE**

January 2013

**RESPONSIBLE OFFICIAL**

Manager, Network Distribution Center

**RECOMMENDATION # 8**

Ensure Postal Service management repair exterior doors that have broken locks and security badge readers that do not operate and hold safety talks with all employees to highlight that security policy states exterior doors are not to be propped open with any devices to bypass security.

**MANAGEMENT RESPONSE/ ACTION PLAN**

The Capital Metro Area is in agreement with the audit finding and recommendation. The repairs to the doors and entry systems are being addressed by the Inspection Service in partnership with the FSO via a perimeter security project which is currently in the design phase. In addition, the Plant Manager sent the attached mailing (exhibit 2) to each NDC employee addressing the issue of tampering with external doors, as well as posted the attached signs (exhibit 3) regarding same to the doors that have been frequently tampered with. Floor supervisors have also been assigned specific doors for monitoring as part of their daily duties.

**TARGET IMPLEMENTATION DATE**

December 2012

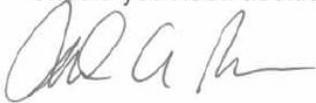
**RESPONSIBLE OFFICIAL**

Manager, Network Distribution Center



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

Should you need additional information, please contact me.



Robert A. Borris  
Manager, Network Distribution Center

Exhibit 1

## SEAT BELTS: YOUR SINGLE MOST EFFECTIVE SAFETY STEP



### Seat Belts: Your Single Most Effective Safety Step

Seat belts are the single most effective traffic safety device for preventing death and injury, according to the National Highway Traffic Safety Administration. Wearing a seat belt can reduce the risk of crash injuries by 50 percent. They save lives:

- Seat belts saved more than 75,000 lives from 2004 to 2008.
- Forty-two percent of passenger vehicle occupants killed in 2007 were unbelted. A 2009 NHTSA study estimates more than 1,600 lives could be saved and 22,000 injuries prevented if seat belt use was 90 percent in every state.

The good news is, in 2009, seat belt use averaged 88 percent nationally, compared with 69 percent in 1998. NHTSA attributes this increase to the "Click It or Ticket" campaign, originally created by the National Safety Council as part of its Air Bag & Seat Belt Safety Campaign.

Nationwide, seat belt use is higher than ever. Yet seat belt use remains lowest among young drivers. NHTSA also reports that, in 2007:

- Seat belt use was lower among blacks than any other race.
- Seat belt use was higher among females than males.
- Seat belt use was lower among drivers who drove alone than drivers with passengers.

### State Seat Belt Laws

Forty-nine states and the District of Columbia have mandatory seat belt laws (the exception is New Hampshire). The Insurance Institute for Highway Safety has a state-by-state map of seat belt laws.

### Primary and Secondary Enforcement

Seat belt use is 13 percent higher in states with primary enforcement (88 percent) than in states with secondary enforcement (75 percent).

- 31 states plus the District of Columbia have primary enforcement of seat belt laws, meaning police can stop vehicles and write citations for failure to buckle up.
- 18 states have secondary enforcement, meaning police can issue a seat belt citation only after a vehicle is stopped for another reason.

MANDATORY SERVICE TALK **** TOUR _____				
Supervisor:	[REDACTED]	DATE: _____	P/L: [REDACTED]	
<i><b>SERVICE</b></i>				
SUBJECT:		Due Date:		
Seatbelts: Your Single Most Effective Safety Step				
	NAME	Employee ID	SIGNATURE	PAY/LOC
1	[REDACTED]			
2	[REDACTED]			
3	[REDACTED]			
4	[REDACTED]			
5	[REDACTED]			
6	[REDACTED]			
7	[REDACTED]			
8	[REDACTED]			
9	[REDACTED]			
10	[REDACTED]			
11	[REDACTED]			
12	[REDACTED]			
13	[REDACTED]			
14	[REDACTED]			
15	[REDACTED]			
16				
17				
18				
19				
20				



Exhibit 2

December 26, 2012

Valued Employee,

I wanted to take this opportunity to thank you for a job well done over the past year, and particularly this Christmas season. While Christmas is a time for celebrating and winding down the year, I need not tell you why Christmas takes on an entirely different meaning for postal employees. In fact I heard said many times recently that this is our Super Bowl. In terms of the increased demand for us to deliver the world's best postal services for our customers, I guess you can say it is very much like the Super Bowl. And you know what?.....We won!!!! We had an extremely successful Christmas, with no mail delays, record levels of service, and happy customers. It doesn't get much better than that, and you played a big role in this win. Whether it was Maintenance, Transportation, Mail Processing, or one of the support groups, the entire team performed well and was critical to our success. Looking forward, I can't begin to tell you how excited I am about where we're headed in 2013. I have no doubt that we can and should be the top performing NDC in the country come September, leading the charge in bringing in a greater market share of the package business, and much needed revenue. That is provided that we continue to stay focused on clearing all of the mail every day, processing the mail with a high level of quality, and dispatching the right mail at the right time, on the right trucks, with the right color codes.

On another important subject, I want to bring up an area where we have not performed as well and where all of us, particularly our leaders, need to improve and that is safety. Everything I mentioned above would be greatly diminished, if in so doing we were incurring injuries and illnesses or risking someone's life in the process. When you consider the environment we work in, with all the heavy machinery, forklifts, and other potential hazards, it is no wonder there are not more significant accidents in the Washington NDC. I'm not particularly proud of the fact that our accident, injury, and illness rates are among the highest in the area. It bothers me a great deal, because I know what it takes to cultivate a safe work environment, and to put it bluntly, it's not happening here. The good news is we can get it back, and I am pledging to lead the way. I'm also calling on all of my managers, supervisors, and craft employees to renew their commitment to safety as well. Curing all the problems we have won't happen overnight and will not be easy, but we'll start by setting clear expectations and by declaring war on three poor work practices that we all recognize and to some extent have been ignoring for too long. The first is towing more than three containers at a time. It's clearly unsafe, and it's not necessary to accomplish our mission. The second is the practice of pushing multiple pallet boxes up the aisles. While this is permissible in the STC staging lanes, it is not permissible to push 2 or more pallets down or across any of the aisles. Lastly, propping open and disabling exterior doors must stop. Nothing undermines our security more than enabling people to enter the facility unchecked and unchallenged. While we will not limit our attention to these areas, we will aggressively pursue these bad habits until they cease being common practice.

In closing, I want to again thank you for all your work and effort to make this Peak Season our best ever. It truly takes a team effort to do what we do every day, and I'm happy to have you on the team and I trust that our customers feel the same as well.

Have a safe and wonderful holiday,

Robert "Bob" Borris  
Manager, Washington NDC

Exhibit 3

**ATTENTION**

**PLEASE DO NOT TAMPER WITH  
THIS DOOR. ANYONE CAUGHT  
TAMPERING WITH THIS DOOR WILL  
BE SUBJECT TO DISCIPLINE UP TO  
AND INCLUDING TERMINATION.**

**MANAGEMENT**