Assessment of U.S. Postal Service Trailer Utilization

OFFICE OF INSPECTOR GENERAL

AUDIT REPORT

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Report Number 22-186-R23 | March 30, 2023

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Highlights

Background

The U.S Postal Service contracts with suppliers that operate highway contract routes (HCR) to transport mail and equipment between plants, post offices, or other designated points that receive or dispatch mail. HCRs made up the largest single group of transportation services used by the Postal Service in fiscal year (FY) 2022. The Postal Service has increased its emphasis on improving trailer utilization of HCRs and Postal Vehicle Services by developing strategies to eliminate underutilized trips and reduce transportation costs. Since FY 2020, trailer utilization has increased 11.58 percent and the Postal Service reported it eliminated 160,000 underutilized trips in an effort to increase trailer utilization and reduce transportation costs. Maximizing trailer utilization means ensuring that trailers are filled as close to capacity as is practicable for each trip.

What We Did

Our objective was to assess whether the Postal Service's management of trailer utilization is effective. To accomplish our objective, we analyzed trailer utilization data, HCR schedules, and load scan performance for FY 2022. Further, we conducted observations at facilities with average trailer utilization above 65 percent, between 40 and 65 percent, and below 40 percent during FY 2022.

What We Found

The Postal Service has opportunities to improve its management of trailer utilization. Specifically, in FY 2022, 83 out of 441 facilities (19 percent) were below the target utilization goal of 40 percent. While the Postal Service has increased its emphasis and developed initiatives to address underutilized transportation, trips were still being underutilized because local transportation management did not consistently monitor and adjust transportation schedules. Additionally, trailer utilization was inaccurate due to load scans not being consistently completed. Specifically, in FY 2022, the Postal Service had an average load scan score of 85.79 percent. This was below the FY 2022 goals for load scans of 92 percent for logistics and 93.25 percent for processing and maintenance.

Recommendations

We recommended the Postal Service (1) coordinate with transportation management at sites with trailer utilization below 40 percent to identify underutilized trips for the Logistics team to review and approve for elimination; and (2) develop a plan to increase load scan scores to meet or exceed the scanning goal at each facility.

Transmittal Letter

OFFICE OF INSPECTOR GENERAL UNITED STATES POSTAL SERVICE

March 30, 2023

MEMORANDUM FOR:

ROBERT CINTRON VICE PRESIDENT, LOGISTICS

MICHAEL BARBER VICE PRESIDENT, PROCESSING AND MAINTENANCE OPERATIONS

Mary K. Sloyd

FROM:

Mary Lloyd Deputy Assistant Inspector General for Mission Operations

SUBJECT:

Audit Report – Assessment of U.S. Postal Service Trailer Utilization (Report Number 22-186-R23)

This report presents the results of our audit of U.S. Postal Service Trailer Utilization.

We appreciate the cooperation and courtesies provided by your staff. If you have any questions or need additional information, please contact Adam Bieda, Director, Transportation, or me at 703-248-2100.

Attachment

cc: Postmaster General Corporate Audit Response Management Chief Logistics Officer

Results

Introduction/Objective

This report presents the results of our self-initiated audit of the Assessment of U.S. Postal Service Trailer Utilization (Project Number 22-186). Our objective was to assess whether the Postal Service's management of trailer utilization is effective. See Appendix A for additional information about this audit.

Background

The Postal Service contracts with suppliers that operate highway contract routes (HCR) to transport mail and equipment between plants, post offices, or other designated points that receive or dispatch mail. HCRs made up the largest single group of transportation services used by the Postal Service in fiscal year (FY) 2022.

The Postal Service has increased its emphasis on improving trailer utilization of HCRs and Postal Vehicle Services by developing strategies to eliminate underutilized trips and reduce transportation costs. Trailer utilization measures how many containers of mail are on a trailer compared with the number of containers that could be loaded on to a trailer (see Figure 1). Maximizing trailer utilization means ensuring that trailers are as close to capacity as is practicable for each trip. The Postal Service pays HCRs for routes taken, regardless of how much mail or equipment is being moved. However, the Postal Service seeks to optimize its surface transportation by evaluating routes to maximize its trailer utilization, which will reduce redundant transportation across the nation, saving both time and money.

Figure 1. Picture of Trailer Utilization



Source: Surface Visibility User Booklet.

In FY 2022, Surface Visibility¹ calculated trailer utilization based on container square feet and trailer length. To ensure an accurate trailer utilization calculation, users must choose the correct trailer length and also correctly perform load scans. When a container is loaded on to a trailer, a Postal Service employee scans a label with a barcode that is attached to the container. This scan is called a load scan (see Figure 2). These scans let the Postal Service know how many containers are loaded on a trailer. Surface Visibility does not calculate utilization based on stacked containers or cubic feet.

However, the Postal Service is adjusting its calculation of trailer utilization to include unload scans² to correct missing load scans for each leg, double stacking containers, and container capacity.

Figure 2. Picture of a Load Scan



Source: Surface Visibility User Booklet.

In March 2021, the Postal Service issued its *Delivering for America* 10-year strategic plan. One of the Postal Service's key strategies is to leverage realtime, actionable, and predictive insights to prevent underutilized transportation. To accomplish this, the Postal Service plans to optimize its surface transportation by evaluating its surface routes to make them more efficient. Another major initiative in the *Delivering for America* plan is to restructure the transportation network by shifting First-Class Mail from air to surface transportation.³ The Postal Service plans to shift 43 percent of First-Class Mail, which is typically transported via air, to surface transportation.

The Postal Service has also been working on aligning its surface transportation network to help the organization improve service performance and move

¹ A system that provides real time transportation updates and reports on the movement of trailers in the surface network.

² Unload scans occur when a Postal Service employee scans a label with a barcode when unloading a container off a trailer.

³ On October 1, 2021, the Postal Service modified existing service standards for First-Class Mail Letters and Flats from a 1-to-3-day service standard to a 1-to-5-day service standard within the continental U.S.

mail and packages more efficiently. The alignment expanded the number of Surface Transfer Centers (STC)⁴ and added "aggregation sites"⁵ to the network. In addition, as part of the optimization of surface transportation routes, the Postal Service established the Trip Reduction of Underutilized Transportation team to identify underutilized and redundant trips, increase trailer utilization, and reduce costs. From FY 2021 to FY 2022, this team reported savings of about \$178 million in transportation costs.

As a result of the strategic initiatives and changes, trailer utilization has improved. Specifically, the Postal Service reported it eliminated 160,000 underutilized trips in an effort to increase trailer utilization and reduce transportation costs. In addition, trailer utilization has increased 11.58 percent since FY 2020 (see Figure 3).

Figure 3. Total Trips with Average Trailer Utilization



Source: U.S. Postal Service Office of Inspector General (OIG) analysis of Surface Visibility data.

Also, as part of its *Delivering for America* plan, the Postal Service is working on a network modernization plan to invest significantly in creating multifunctional distribution centers. The Postal Service's transportation model will be completely transformed with the new footprint of processing and delivery facilities and could result in fewer trips and an increase in trailer utilization. The Postal Service expects the new strategy to reduce redundant transportation across the nation, saving both time and money.

During our audit, we judgmentally selected 11 sites nationwide to visit and complete observations. We included sites with average trailer utilization above 65 percent, between 40 and 65 percent, and below 40 percent during FY 2022 (see Table 1).

Table 1. Sites Visited

Trailer Utilization	Facility	Average Load Percentage
	Southern Area, TX, Surface Transfer Center (STC)	71.20%
Above 65%	Pennwood Place, PA, Processing and Distribution Center (P&DC)	65.16%
Between	Phillipsburg, NJ, STC	64.77%
40% and	Indianapolis, IN, STC	62.64%
65%	CAP Metro, MD, STC	58.14%
	Mid Florida, FL, P&DC	39.84%
	Indianapolis, IN, P&DC	34.79%
Below 40%	Philadelphia, PA, P&DC	34.19%
	Birmingham, AL, P&DC	32.81%
	Charlotte, NC, P&DC	31.87%
	Phoenix, AZ, P&DC	24.51%

Source: OIG analysis of Surface Visibility data.

During our site observations and reviews of low trailer-utilization, we found multiple factors that contributed to underutilized trailers that were out of local management's control. These included low mail volume, multiple networks handling mail to meet existing service standards, and mail mix⁶ at a

4 STCs are facilities where mail and packages are received in containers for consolidation and cross-docking to destination facilities, which increases trailer utilization and helps reduce the number of daily trips needed.

5 Aggregate sites reside in existing processing facilities where mail is accepted from smaller facilities and aggregated before going directly to a destination facility, or to the STCs, for further consolidation.

6 For example, a facility that only processes letters and flats will not have as much volume compared with a facility that processes letters, flats, and parcels

facility. To help increase trailer utilization and address these contributing factors, the Postal Service uses multi-stop trips⁷ (trips that transport mail between multiple processing facilities before reaching their final destination) and STCs (concentration points for consolidating mail from underutilized surface trips).

Finding #1: Underutilized Transportation

The Postal Service has opportunities to improve its management of trailer utilization. Specifically, in FY 2022, 83 out of 441⁸ facilities (about 19 percent) were below the target utilization National Performance Assessment⁹ goal of 40 percent¹⁰ (see Table 2).

Table 2. Number of Facilities by Average Utilization Goal

Utilization Goal	FY 2022
Above 65%	86
Between 40% and 65%	272
Below 40%	83
Total	441

Source: OIG analysis of Surface Visibility data.

The Postal Service has increased its emphasis on developing initiatives to address underutilized transportation. However, trips were still underutilized because Postal Service employees were not consistently monitoring and adjusting transportation schedules and completing load scans.

Transportation Schedule Reviews

Local transportation management did not consistently monitor and adjust transportation schedules based on need, which contributed to low trailer utilization. According to policy, Postal Service management should perform dispatch discipline

reviews at all processing facilities on a semiannual basis, at a minimum." These reviews ensure that processed mail volumes are moved as planned to meet intended transportation and that they achieve the best possible service at the most cost-effective rate.

"We identified 28,113 trips (about 36 percent) that had trailer utilization below 40 percent and 6,909 trips (about 9 percent) that ran empty."

During our analysis of utilization data, we judgmentally selected a sample of 30 facilities¹² to review from the 83 facilities with trailer utilization below 40 percent in FY 2022. We identified 28,113 trips (about 36 percent) that had trailer utilization below 40 percent and 6,909 trips (about 9 percent) that ran empty (zero trailer utilization) (see Table 3).

Specifically, there were five facilities that had 58 percent or more of its trips run with utilization below 40 percent (see Table 4).

Table 3. Total Outbound Trips Below 40 Percent Utilization

Total	Trips Below	Percentage of Trips	Trips	Percentage of
Outbound	40 Percent	Below 40 Percent	with Zero	Trips with Zero
Trips	Utilization	Utilization	Utilization	Utilization
78,846	28,113	36%	6,909	9%

Source: OIG analysis of Surface Visibility data.

⁷ For example, a trailer on the first leg of a multi-leg trip may have utilization under 40 percent because it is loaded with letters and flats. This trailer will collect more mail, such as parcels, from other processing facilities. This increases trailer utilization.

⁸ This includes facilities where HCRs transport mail and equipment among processing facilities (i.e., plant-to-plant and plant-to-STCs).

⁹ A system that collects performance-related metrics and supports the Pay for Performance program and Performance Evaluation System. These metrics are translated into web-based balanced scorecards that can be used to monitor the performance of both the entire enterprise and individual units across the nation.

¹⁰ The Postal Service established a trailer utilization metric for its National Performance Assessment scorecard in FY 2022. Surface transportation trip-utilization-targeted thresholds range from 24 percent.

¹¹ Dispatch & Routing Policies Handbook M22.

¹² The sample included the following P&DCs: Ashville, NC; Birmingham, AL; Carol Steam, IL; Champaign, IL; Charlotte, NC; Eureka, CA; Fox Valley, IL; Fresno, CA; Gary, IN; Grand Rapids, MI; Indianapolis, IN; Jacksonville, FL; Miami, FL; Mid Florida, FL; Tampa, FL; Nashville, TN; North Bay, CA; Pensacola, FL; Philadelphia, PA; Phoenix, AZ; Peoria, IL; Quad Cities, IL; Rochester, NY; Rockford, IL; Salt Lake City, UT; Southern MD, MD; and San Jose, CA. The sample also includes the Tallahassee, FL, Processing and Distribution Facility (P&DF), Van Nuys, CA, Annex, and Fayetteville, NC, Package Support Annex.

Table 4. Total Outbound Trips Below 40 Percent Utilization

Facility	Total Outbound Trips	Trips Below 40 Percent Utilization	Percentage Below 40 Percent
Philadelphia, PA, P&DC	342	199	58%
Champaign, IL, P&DF	240	156	65%
Carol Stream, IL, P&DC	617	361	59%
Birmingham, AL, P&DC	360	214	59%
Charlotte, NC, P&DC	140	84	60%

Source: OIG analysis of Surface Visibility data.

Table 5. Total Outbound Trips with Zero Utilization

Facility	Total Outbound Trips	Trips With Zero Utilization	Percentage Zero Utilization
Salt Lake City, UT, P&DC	1,062	214	20%
Grand Rapids, MI, P&DC	670	125	19%

Source: OIG analysis of Surface Visibility data.

Also, there were two facilities that had at least 19 percent of their trips run empty (see Table 5). While there are valid reasons for this, the average number of trips that ran empty for the other 28 facilities was significantly lower, at 5.78 percent. Trips run empty for different reasons. For example, it may be a roundtrip where the trailer departs empty but will pick up mail at the next destination or a trip delivering mail at a destination may return empty because there is no mail to pick up. Another example would be empty mail containers, which do not receive a load scan, being picked up or dropped off at another facility.

Additionally, we reviewed the transportation schedules at the 30 facilities with trailer utilization below 40 percent. Specifically, we identified the following redundant and empty trips from October 2021 through September 2022:

- At the Philadelphia P&DC, there were multiple trips with low utilization departing to the Southeastern, PA, P&DC, and Tri-County Annex, two facilities that share the same physical address.
- At the Carol Stream P&DC, there were multiple HCR and Postal Vehicle Service¹³ trips transporting mail to the same facilities that had low utilization.

- At the Gary P&DC, there were five advanced dispatches¹⁴ departing to the Indianapolis Mail Processing Annex in a six-hour span with an average utilization from three percent to eight percent.
- At the Nashville P&DC, there was a trip operating daily to the Memphis, TN, Network Distribution Center that ran empty on Sundays, Mondays, Tuesdays, Thursdays, and Fridays. In addition, there was a trip operating every day, except Monday, from the Music City Annex to the Nashville P&DC, with an average trailer utilization of 10 percent.
- At the Rochester P&DC, there were underutilized trips departing to the Buffalo, NY, P&DC within 40 minutes of each other.
- At the Miami P&DC, there were multiple one-way trips to multiple facilities with

^{**}There were two facilities that had at least 19 percent of their trips run empty.**

¹³ Internally operated by the Postal Service. Postal Vehicle Service drivers are career Postal Service employees who move mail among processing facilities, inner-city delivery offices, and local businesses and mailers.

¹⁴ Mail sent early enough to arrive at the destination facility prior to that facility's critical entry time. Critical entry time is the latest time that committed mail can be received in an operation and still be processed.

utilization from three to 15 percent. In addition, there were over 200 trips that operated daily, except Saturday and Sunday, between the Royal Palm, FL, P&DC, and the Miami P&DC.

Furthermore, during our site observations, we identified the following additional issues at sites with trailer utilization below 40 percent:

- At the Birmingham P&DC, there were 98 trips that operated each Tuesday through Friday destined for the Birmingham Annex, which could be potential redundant trips. In addition, a Birmingham P&DC route had 51 trips that operated on Sundays and 53 trips that operated on other days from October 2021 through September 2022, which departed empty.
- At the Phoenix P&DC, 172 of the 183 trips (94 percent) destined for the West Valley P&DC departed empty from January 2022 through September 2022.
- At the Indianapolis P&DC, 1,160 of 1,771 trips (66 percent) operating between 7:20 a.m. and 7:40 a.m., departed empty for the Indianapolis High School Road Annex from October 2021 through September 2022.

During our audit, we identified potential opportunities for the Postal Service to reduce or eliminate redundant trips and trips that run empty. By modifying or eliminating these trips, the Postal Service could improve trailer utilization and reduce transportation costs.

Recommendation #1

We recommend the **Vice President, Logistics** coordinate with transportation management at sites with trailer utilization below 40 percent to identify underutilized trips for the Trip Reduction of Underutilized Transportation team to review and approve for elimination.

Missed Load Scans

Trailer utilization was inaccurate due to load scans not being consistently completed. When a container does not receive a load scan, the number of containers recorded on a trailer will be lower than what is actually there because these scans let the Postal Service know how many containers are loaded on a trailer. Load scans are crucial and inform the Postal Service how full a trailer is. In FY 2022, the average load scan score was 85.79 percent (see Table 6). This was below the FY 2022 National Performance Assessment load scan goals of 92 percent for logistics¹⁵ and 93.25 percent for processing and maintenance.¹⁶ Postal Service policy states employees are required to perform load scans to ensure 100 percent mail visibility and management should ensure employees are scanning containers before loading them onto a trailer.¹⁷

Table 6. FY 2022 Load Scan Performance

Number of	Average	Average Load
Facilities	Utilization	Score
441	52.05%	85.79%

Source: Postal Service Surface Visibility and OIG analysis.

Additionally, for the 83 facilities with trailer utilization below 40 percent in FY 2022, the average trailer utilization was 29.28 percent, with an average load scan score of 81.83 percent (see Table 7).

Table 7. FY 2022 Load Scan Performance for Facilities With Trailer Utilization Below 40 Percent

Number of	Average	Average Load
Facilities	Utilization	Score
8318	29.28%	81.83%

Source: Postal Service Surface Visibility and OIG analysis.

When containers do not receive a load scan, Postal Service management does not have accurate scan data to measure performance and make operational decisions or determine if trailers are underutilized.

Recommendation #2

We recommend the **Vice President, Logistics**, and the **Vice President, Processing and Maintenance Operations**, develop a plan to increase load scan scores to meet or exceed the National Performance Assessment scanning goal at each facility nationwide.

15 For FY 2022, the logistics goal was 92 percent. The goal is a composite score for the following types of scans: Load, Unload, Trailer Arrival, and Trailer Departure indicators.

16 For FY 2022, the Processing and Maintenance Scan Composite goal was 93.25 percent. The goal is a composite score for the following types of scans: Origin Enroute, Destination Enroute, Surface Visibility Assign, Surface Visibility Close, Surface Visibility Load, Surface Visibility Unload, Receipt Scan Performance, and Bundle Visibility Nested indicators.

17 Surface Visibility Program User Booklet.

18 Peak season annexes and mailers are excluded in this table.

Management's Comments

Management agreed with the finding; agreed with recommendation 2; but disagreed with recommendation 1. See Appendix B for management's comments in their entirety.

Regarding recommendation 1, management stated that they already have a process in place that addresses underutilized trips. Specifically, management stated that in FY 2021, a dashboard was created to identify trips that were underutilized; headquarters provides a monthly file to the field showing all trips that have an average utilization under 35 percent for the prior 60 days; and each division is supposed to identify underutilized transportation and coordinate with headquarters to determine action necessary to improve utilization performance. Furthermore, management noted that headquarters and the field are completing a "Ground Initiative" to consolidate and streamline trips.

Regarding recommendation 2, management stated that Logistics will partner with Processing to review opportunities for load scans. The target implementation date is April 30, 2023.

Evaluation of Management's Comments

The OIG considers management's comments responsive to recommendation 2. We consider management's comments nonresponsive to recommendation 1.

Regarding recommendation 1, while we recognize that the Postal Service has processes in place, we found trips remain underutilized and we identified redundant and empty trips where there was opportunity for local management to consolidate or eliminate trips. Further action is needed to address underutilized trips. We view the disagreement with recommendation 1 as unresolved and plan to pursue it through the audit resolution process.

All recommendations require OIG concurrence before closure. Consequently, the OIG requests written confirmation when corrective actions are completed. 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.

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Scope and Methodology

In this audit, we reviewed the Postal Service's management of trailer utilization. To accomplish our objective, we:

- Identified and reviewed policies, procedures, and criteria related to trailer utilization and load scans.
- Interviewed Headquarters Logistics management to gain an understanding of the process related to trailer utilization. Also, discussed strategic initiatives related to trailer utilization.
- Obtained and reviewed Postal Service initiatives for the *Delivering for America* plan and determined if they impacted trailer utilization.
- Obtained and analyzed trailer utilization data for HCRs (i.e., plant-to-plant and plant-to-surface transfer centers) from FYs 2020 to 2022. Also, reviewed trailer utilization data for sites with an average trailer utilization below 40 percent and judgmentally selected a sample of sites to review transportation schedules.
- Validated the Postal Service's methodology for HCR trailer utilization for FY 2022.
- Obtained and analyzed nationwide load scan performance for FY 2022.

- Determined whether the Postal Service is meeting National Performance Assessment targets related to trailer utilization and load scans.
- Conducted site observations at judgmentally selected sites to determine trailer utilization for selected HCRs and load scanning performance.

We conducted this performance audit from September 2022 through March 2023 in accordance with generally accepted government auditing standards and included such tests of internal controls as we considered necessary under the circumstances. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective. We discussed our observations and conclusions with management on March 7, 2023, and included their comments where appropriate.

We assessed the reliability of data in the Enterprise Data Warehouse, Surface Visibility, Transportation Optimization Planning Scheduling, and Transportation Contract Support System by reviewing related documentation; testing for completeness by recalculating the data; and comparing it to other related data. We determined that the data were sufficiently reliable for the purposes of this report.

Report Title	Objective	Report Number	Final Report Date	Monetary Impact
Efficiency of Operations at the Seattle, WA, Processing and Distribution Center	Evaluate the efficiency of operations at the Seattle P&DC.	22-094-R22	5/19/2022	\$0
Transportation Network Optimization and Service Performance	Assess opportunities to optimize the U.S. Postal Service's transportation network and meet service performance goals.	20-144-R20	6/5/2020	\$199,558,680

Prior Audit Coverage

Appendix B: Management's Comments



Date: 3/24/2023

JOHN CIHOTA DIRECTOR, AUDIT SERVICES

SUBJECT: Management Response: Assessment of U.S. Postal Service Trailer Utilization (Project Number 22-186-DRAFT)

Thank you for providing the Postal Service with an opportunity to review and comment on the finding and recommendation contained in the draft audit report, *Assessment of U.S. Postal Service Trailer Utilization.*

Management agrees with the findings below regarding Trailer utilization.

- Opportunity exists with Local Management of trailer utilization.
- 83 of 441 facilities were below the target of 40% utilization
- Load Scans need improvement

Recommendation 1:

We recommend the **Vice President, Logistics** coordinate with transportation management at sites with trailer utilization below 40 percent to identify underutilized trips for the Trip Reduction of Underutilized Transportation team to review and approve for elimination.

Management Response/Action Plan:

Management Disagrees with this Recommendation as we already have a process in place that addresses Underutilized Trips.

Surface Logistics, Enterprise Analytics, and Transportation Strategies collaborate regularly to address underutilized transportation opportunities. Starting in FY21, the Highway Contract Route Optimization Team took the lead on the Trip Reduction of Under-utilized Transportation (TROUT) initiative. The team worked with Logistics Modeling and Analytics and the Surface Visibility teams to create the TROUT dashboard. This analytics tool identifies lanes with under-utilized trips to direct the team to opportunities to consolidate and reduce excess trips. In addition to the TROUT dashboard, Enterprise Analytics provides a monthly data file displaying all trips that have an average utilization of under 35% for the prior 60 days. The TROUT team uses both data sources to identify reduction opportunities, generate solutions, and presents the solutions to the local sites. The sites review, provide feedback, and a decision of the type of action to be taken. In addition to this activity, each Division has been assigned to identify underutilized transportation and coordinate with the surface planner team to determine action necessary to improve utilization performance. The HQ Surface Planning group along with field operations is currently completing a "Ground Initiative" to consolidate routes and streamline routes. This will provide better utilization and arrival times for routings affected by this initiative.

Target Implementation Date: N/A

Responsible Official: Sr. Director, Surface Logistics

Recommendation [2]:

We recommend the Vice President, Logistics, and the Vice President, Processing and Maintenance Operations, develop a plan to increase load scan scores to meet or exceed the National Performance Assessment scanning goal at each facility nationwide.

<u>Management Response/Action Plan:</u> Management **agrees** with this recommendation.

· Logistics will partner with Mail Processing to review opportunities for Load Scans

Target Implementation Date: 04/30/2023

Responsible Official: Sr. Director, Surface Logistics, Director Surface Logistics Planning

E-SIGNED by Robert Cintron on 2023-03-24 15:23:22 CDT

Robert Cintron Vice President, Logistics

E-SIGNED by Michael L Barber on 2023-03-24 15:17:24 CDT

Mike Barber Vice President, Processing & Maintenance Operations

cc: Corporate Audit Response Management

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1735 North Lynn Street, Arlington, VA 22209–2020 (703) 248–2100

For media inquiries, please email press@uspsoig.gov or call (703) 248-2100