



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

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# **Post-Implementation Review Process**

## **Audit Report**

September 28, 2012

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**Report Number CI-AR-12-007**



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

# HIGHLIGHTS

September 28, 2012

## Post-Implementation Review Process

Report Number CI-AR-12-007

### **BACKGROUND:**

The U.S. Postal Service consolidates mail processing operations to improve operational efficiency and service. In response to significant market changes and mail volumes since 2006, the Postal Service has reduced the number of mail processing facilities from 673 in fiscal year (FY) 2006 to 461 in FY 2011. The Post-Implementation Review (PIR) is used to evaluate the effectiveness of consolidations by comparing actual savings and service impacts with projections.

This audit focused on 35 consolidations that were implemented between FYs 2009 and 2011. Our objective was to evaluate the PIR process and the related savings calculations.

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

The PIR process used to evaluate whether area mail processing (AMP) consolidations achieve projected savings can be improved. Thirty-four of 35 final PIRs (97 percent) reported greater than projected savings based on the methodology used; however, impacts from concurrent initiatives were included and not identified separately in the PIR.

The current policy pertaining to PIRs could be improved to address reporting inconsistencies. The process of allocating costs and savings

associated with other initiatives and multiple facilities consolidated into the same gaining facility is inconsistent. In addition, 14 of the 35 PIRs (40 percent) did not always report results from the individual consolidation worksheets that calculate PIR savings, resulting in an understatement of about \$4.8 million. Finally, 32 of the 35 (91 percent) PIRs were not completed timely. When the PIRs are not completed accurately or timely, it diminishes management's ability to understand the complete AMP impact, ensure accountability, and take any needed action.

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

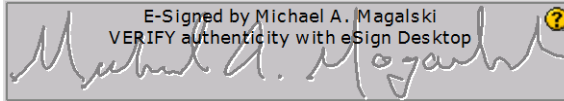
We recommended that management improve the PIR guidelines to separate savings and costs associated with concurrent initiatives; implement the use of automated data calculations for PIR worksheets; establish a process to allocate savings and costs when multiple losing facilities are consolidated into the same gaining facility; and assess whether current PIR milestones to complete PIRs should be adjusted.

[Link to review the entire report](#)



September 28, 2012

**MEMORANDUM FOR:** DAVID E. WILLIAMS  
VICE PRESIDENT, NETWORK OPERATIONS

E-Signed by Michael A. Magalski  
VERIFY authenticity with eSign Desktop  


**FROM:** MICHAEL A. MAGALSKI  
Deputy Assistant Inspector General  
for Support Operations

**SUBJECT:** Audit Report – Post-Implementation Review Process  
(Report Number CI-AR-12-007)

This report presents the results of our audit of the Post-Implementation Review Process (Project Number 12WG007CI000).

We appreciate the cooperation and courtesies provided by your staff. If you have any questions or need additional information, please contact Michael L. Thompson, director, Planning, Innovation, and Optimization or me at 703-248-2100.

Attachments

cc: Megan Brennan  
Corporate Audit and Response Management

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## Introduction

This report presents the results of our audit of the Post-Implementation Review (PIR) process for consolidating mail processing operations (Project Number 12WG007C1000). Our objective was to evaluate the PIR process and the related savings calculations. This self-initiated audit addresses operational risk. See [Appendix A](#) for additional information about this audit.

The PIR is used to evaluate the effectiveness of consolidating mail processing operations by comparing the projected Area Mail Processing (AMP) consolidation savings to the actual savings after implementation. There are two PIRs performed after a consolidation is implemented. The first PIR is completed within 30 days after the 2nd full quarter following implementation and the final PIR is completed within 30 days after the 1st full year of implementation.

## Conclusion

The PIR process used to evaluate whether AMP consolidations achieve projected savings can be improved. Thirty-four out of 35 final PIRs (97 percent) reported greater than projected AMP savings based on the methodology used. However, impacts from concurrent initiatives were included and not identified separately in the PIR. The current policy pertaining to PIRs could be improved to address reporting inconsistencies. The process of allocating costs and savings associated with other initiatives and multiple facilities consolidated into the same gaining facility is only addressed in the PIR summary narrative. In addition, 14 of the 35 PIRs (40 percent) did not always report results from the worksheets resulting in an understatement of about \$4.8 million. Finally, 32 of 35 (91 percent) final PIRs were not completed timely. When the PIRs are not completed accurately or timely, it diminishes management's ability to understand the complete AMP impact, ensure accountability, and take any needed action.

## Savings Achieved

The 35 final PIRs reviewed reported annual savings of about \$467 million based on the methodology used, a variance of more than \$367 million (369 percent) over the projected savings. This variance occurred due to better than expected AMP productivity increases and savings from concurrent initiatives. See [Appendix B](#) for details on PIR results and [Appendix C](#) for the list of 35 consolidations with PIR results.

In addition to the AMP savings, there were other benefits identified in the PIRs for the 35 consolidations. Specifically:

- **Increased Productivity:** Productivity increased 14 percent after the consolidations at the gaining facilities, which exceeded the 5-percent projected increase.

- **Reduced Standby Time<sup>1</sup>**: Overall costs for mail processing standby time decreased by 56 percent – from about \$7.7 million to \$3.4 million. Of 39 gaining facilities,<sup>2</sup> 72 percent achieved reductions in standby costs, while 18 percent experienced an increase. The remaining 10 percent reported no standby time before or after the consolidations.
- **No employee layoffs**: Employees impacted by the consolidation were reassigned to the gaining facility, another mail processing facility, or another facility outside the mail processing network. Other employees accepted early retirement incentives or resigned.

### Concurrent Initiatives

Management reported impacts from concurrent initiatives in the PIR summary narrative but did not separate the amounts associated with these initiatives from the consolidation savings or costs. According to management, it is difficult to quantify amounts not directly related to the AMP in the PIR. Management is aware of the impact from concurrent initiatives on PIR results and is examining ways to clarify the PIR reporting.

The South Florida, FL Processing and Distribution Center (P&DC) consolidation provides an example of the impact of concurrent initiatives on AMP savings. This AMP projected \$2.8 million in savings; however, the final PIR indicated \$48 million in savings. The additional savings resulted from multiple major initiatives within the district's processing plants including the closure of a Miami annex and the opening of the South Florida Logistics and Distribution Center in Miami.

All of the 35 PIRs contained additional costs and savings from other initiatives with the PIR results. These concurrent national and local initiatives included early retirement incentives, tour compression,<sup>3</sup> staff restructuring, staffing and scheduling study impacts, and operational streamlining.

Although concurrent initiatives usually increase PIR savings, added costs can also reduce projected savings. One of the 35 PIRs with an AMP projected savings of \$2.7 million was not achieved; instead, it had a shortfall of about \$760,177. Management noted in the PIR that costs associated with the deployment of three Flats Sequencing System (FSS)<sup>4</sup> machines were included in the Kilmer, NJ P&DC PIR, which impacted the projected AMP savings.

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<sup>1</sup> Workhours of mail processing employees who are kept on the clock, but are idle as a result of lack of work or unplanned events.

<sup>2</sup> There were 35 consolidations, but four losing facilities consolidated operations into two different gaining facilities.

<sup>3</sup> Reduction of processing hours on the daytime shift.

<sup>4</sup> FSS is a mail-sortation system that automates the sorting of flat-sized mail into delivery address order.

## Improve Post-Implementation Review Guidelines

The Postal Service significantly improved the AMP process in March 2008 with the revision of Handbook PO-408.<sup>5</sup> However, these changes focused on the worksheets supporting AMP consolidations. A supporting workbook was developed to capture and report the savings for an AMP. The PIR process was not updated and some procedures are unclear and can lead to reporting inconsistencies.

The use of electronic worksheets, as with the current AMP worksheets, can improve the consistency and accuracy of PIR results. Formulas in worksheets should calculate data and transfer that data to other worksheets. Our review identified opportunities for improvement with the individual PIR worksheets, multiple losing facilities and calculation references section. Specifically:

- **PIR Worksheets:** The formula calculations, population, and reporting format showed 14 of 35 PIRs (40 percent), of the PIR worksheets understated the total savings by about \$4.8 million.
  - Not all supervisory and craft joint operations were included in the savings calculations for the “Non-Processing Craft Workhour” savings.
  - Data exclusion and population issues caused differences in the transportation savings.

Refer to [Appendix B](#) for PIR results comparison.

- **Multiple losing facilities:** The current PIR worksheet format does not separate savings for multiple losing facilities when consolidated into the same gaining facility, resulting in the same savings being attributed to both AMPs. For example, the Lakeland, FL P&DC and Manasota, FL P&DC PIRs include the exact savings from the same gaining facility’s craft, maintenance, and Postal Vehicle Service (PVS)<sup>6</sup> reductions. The Lakeland PIR included 6 months of the Manasota AMP, while the Manasota PIR included 1 year of Lakeland’s AMP.
- **Calculation References:** The “Calculation References” section is part of the Executive Summary worksheet. Postal management developed this manual section to confirm the “Summary of Worksheets” section. In two PIRs, we found the calculation reference amounts did not match the AMP totals and the PIR summary of worksheets totals. Management stated the calculations reference is a manual process and should always be checked. Because the correct amounts were reported in the Summary of Worksheets totals, this issue did not impact the PIR results.

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<sup>5</sup> Handbook PO-408, *Area Mail Processing Guidelines*, provides a process for the review and implementation of AMP proposals.

<sup>6</sup> A service operated by Postal Service employees to transport mail between mail processing facilities, post offices, Post Office branches, Post Office stations, detached mail units, various postal customers, and terminals.

## Timely Post-Implementation Reviews

Our review of the 35 PIRs revealed that one final PIR was completed timely according to the 60-day guideline.<sup>7</sup> There were 32 final PIRs not completed within the guidelines' timeframes and two<sup>8</sup> that could not be confirmed.<sup>9</sup> Management said the procedures do not allow enough time for the completion of the PIRs. Specifically, due to the PIR data collection period of generally 2 weeks, area management is left with only 2 weeks to complete the PIR. Additionally, since FY 2010, the increase in AMP consolidations has caused a delay in completing PIRs in a timely manner.

As of June 15, 2012, and based on the current PIR guidelines, 42 final PIRs should have been completed. According to management, seven of the 42 PIRs have not been completed due to the national network rationalization initiative to consolidate and reduce the mail processing and transportation networks.

When PIRs are not completed<sup>10</sup> accurately or timely, it diminishes management's ability to understand the complete AMP impact, ensure accountability, and take any needed action.

## Recommendations

We recommend the vice president, Network Operations:

1. Improve the Post-Implementation Review (PIR) process in Handbook PO-408, *Area Mail Processing Guidelines* to:
  - Identify and separate savings and costs associated with other concurrent initiatives from savings and costs directly related to the area mail processing consolidation.
  - Implement the use of automated data calculation and pre-population for PIR worksheets and checklists.
  - Establish a process to allocate savings and costs when multiple consolidations are made into the same gaining facility.
  - Assess whether current PIR timelines should be adjusted.

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<sup>7</sup> Chapter 7 of Handbook PO-408.

<sup>8</sup> Columbus, GA Customer Service Mail Processing Center and Hickory, NC Processing and Distribution Facility.

<sup>9</sup> Approval signature from the vice president, Network Operations was not included in the final PIR disposition.

<sup>10</sup> A PIR is not considered complete until it has been reviewed and approved by the vice president, Network Operations.



## Management's Comments

Management agreed with the recommendation in the report. Specifically, management stated that in response to recommendation 1, effective March 2014, the Postal Service will update Handbook PO-408 and develop a separate PIR User's Guide with detailed processes for developing and completing a PIR. See [Appendix D](#) 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 recommendation and corrective actions should resolve the issues identified in the report.

The OIG considers the recommendation significant and, therefore, requires OIG concurrence before closure. Consequently, the OIG requests written confirmation when corrective action is completed. This recommendation should not be closed in the Postal Service's follow-up tracking system until the OIG provides written confirmation that the recommendation can be closed.

## Appendix A: Additional Information

### Background

In response to significant market changes and mail volumes since 2006, the Postal Service has consolidated mail processing facilities to eliminate excess capacity, reducing the number of mail processing facilities from 673 in FY 2006 to 461 in FY 2011.

The Postal Service uses Handbook PO-408, to consolidate mail processing operations to improve operational efficiency and service. Following the implementation of an AMP, a PIR is performed to assess whether planned savings, costs, workhours, and levels of service are achieved. Two PIRs are performed to measure savings before and after the AMP consolidation:

- The first PIR is completed within 30 days after the 2nd full quarter (about 6 months) following the completed implementation. It indicates whether the gaining facility is on target for achieving expected savings and alerts management to change or correct deficiencies. If needed, an action plan is developed to ensure targets are met by the gaining facility.
- The final PIR is completed within 30 days after the 1st full year of the completed implementation. It compares the AMP data against the actual results and determines the viability of the consolidation and allows management the opportunity to analyze the results.

Between FYs 2004 and 2011, the Postal Service implemented 103 AMP consolidations. Since FY 2004, the Postal Service improved the AMP process by updating the criteria and revised Handbook PO-408 in March 2008.

### Objective, Scope, and Methodology

Our audit objective was to evaluate the PIR process and related savings calculations. We reviewed the PIR process, including AMP and PIR supporting documentation, interviewed Postal Service officials, and evaluated the impact to PIR savings from other initiatives.

Our scope focused on 35 final PIRs completed or due by June 15, 2012. We did not review PIRs associated with the 14 AMPs implemented between FYs 2004 and 2008. As of June 15, 2012, the Postal Service should have completed 42 final PIRs for AMPs implemented in FYs 2009 through 2011. According to management, seven of the 42 PIRs have not been completed due to other network rationalization efforts. We did not review service standard impacts in this audit.

We relied on supporting documentation provided by the Postal Service to analyze savings calculations associated with PIR results. We confirmed the accuracy of data and our analysis with management.

We conducted this performance audit from April through September 2012 in accordance with generally accepted government auditing standards and included such tests of internal controls as we considered necessary under the circumstances. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective. We discussed our observations and conclusions with management on September 10, 2012, and included their comments where appropriate.

We assessed the reliability of computer-generated data by interviewing agency officials knowledgeable about the data. We determined that the data were sufficiently reliable for the purposes of this report.

### Prior Audit Coverage

The OIG identified one prior audit or review related to the objective of this audit:

*U.S. Postal Service Past Network Optimization Initiative* (Report Number [CI-AR-12-003](#), dated January 9, 2012), stated the Postal Service improved the AMP process by updating feasibility studies and stakeholder communication. The PIRs indicated that Postal Service realized annual savings of about \$323 million. However a variance of more than \$229 million occurred, because concurrent initiatives' savings were included with AMP consolidation savings. We noted five of the 33 PIRs did not achieve projected savings and 14 PIRs were past due. Management agreed with our findings and recommendations and stated they will revise the Area Mail Processing Communications Plan to incorporate stakeholder input concerning AMPs. Management will implement this by June 2012. Management will also ensure resources are allocated to complete PIRs timely. Management will implement this beginning in March 2012.

## Appendix B: Additional Post-Implementation Review Results

We consolidated data from the 35 final PIRs obtained from postal management and then compared and reconciled the amounts with the individual worksheets and executive summary results. Savings were primarily achieved from reductions in workhours in the mail processing network, as detailed in the following table.

**Table 1: PIR Results Comparison**

PIR Categories	PIR	OIG	(Under) and Over Reported
Function 1 Workhour Savings	\$337,362,962	\$337,362,962	\$0
Non-Processing Craft Workhour Savings (less Maintenance/Transportation)	27,432,079	31,742,993	(4,310,914)
Postal Career Executive Service/Executive and Administrative Schedule Workhour Savings	54,916,821	54,916,821	0
Transportation Savings	24,636,699	25,171,761	(535,062)
Maintenance Savings	22,187,835	22,187,835	0
Space Savings	212,791	212,791	0
<b>Total Annual Savings</b>	<b>\$466,749,187*</b>	<b>\$471,595,163</b>	<b>(\$4,845,976)</b>
One-Time Costs	(6,631,770)	(6,631,770)	0
<b>Total 1st Year Savings</b>	<b>\$460,117,417</b>	<b>\$464,963,393</b>	<b>(\$4,845,976)</b>

Note: \*Due to rounding differences, this amount is less than the total annual savings in Appendix C.

### Workhours

Mail processing workhour costs declined 14 percent, from about \$2.4 million to \$2 million. The total savings from workhour reductions amount to 96 percent of the total annual savings of \$467 million, which included savings noted above in Function 1 (mail processing) craft workhours, non-processing craft workhours, and Postal Career Executive Service/Executive and Administrative Schedule (PCES/EAS) workhours. Other workhour reductions came from PVS transportation and maintenance workhour savings, about \$14 million and \$15 million, respectively.

### Transportation

Transportation costs decreased from about \$460 million to \$435 million (5 percent). Specifically, \$8 million was saved in contract costs over the term of the existing highway contract routes.<sup>11</sup> PVS savings included \$3 million on mileage and leased vehicles and about \$14 million in PVS workhour reductions.

### Maintenance

Total maintenance costs were reduced to \$670 million from about \$693 million. The consolidations resulted in a 3-percent reduction in maintenance costs from workhour reductions, parts, and supplies. Long-term initiatives continue to be addressed to improve performance and reduce costs.

<sup>11</sup> A service operated by a Postal Service contractor to transport mail in bulk between designated points.

Space

Only two<sup>12</sup> of the consolidations reported space savings resulting in a slight increase to the savings. When space becomes available through the relocation of operations for Postal Service owned or leased facilities, savings may be achieved from the vacated space.

One-Time Costs

Total one-time costs reduced the 1st year annual savings by \$6.6 million. These costs are related to employee and equipment relocations and facility costs.

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<sup>12</sup> Bloomington, IN P&DC and Kansas City, KS P&DC.

### Appendix C: List of 35 Consolidations with Final Post-Implementation Review Results

	Area	Losing Facility	ST	Gaining Facility	ST	Type	Annual Savings
1	SE	Athens CSPMC	GA	North Metro P&DC	GA	Originating	\$14,756,624
2	NE	Binghamton P&DF	NY	Syracuse P&DC	NY	Originating	11,703,480
3	GL	Bloomington P&DC	IN	Indianapolis P&DC	IN	Originating	8,324,664
4	EA	Canton P&DC	OH	Akron P&DC	OH	Originating	7,045,503
5	NE	Cape Cod P&DF	MA	Brockton P&DC	MA	Originating	7,306,130
6	CM	Charlottesville P&DF	VA	Richmond P&DC	VA	Orig&Dest	12,582,931
7	SW	Columbus CSMPC	GA	Macon P&DC	GA	Originating	2,697,748
8	GL	Detroit P&DC	MI	Michigan Metroplex P&DC	MI	Originating	43,212,948
9	GL	Flint P&DC	MI	Michigan Metroplex P&DC	MI	Originating	2,292,466
10	CM	Frederick P&DC	MD	Suburban P&DC	MD	Originating	6,319,663
11	CM	Hickory P&DF	NC	Greensboro P&DC	NC	Originating	7,841,897
12	EA	Jackson CSMPC	TN	Memphis P&DC	TN	Originating	6,217,344
13	WE	Kansas City P&DC	KS	Kansas City P&DC	MO	Orig&Dest	17,543,665
14	NY	Kilmer P&DC	NJ	Dominick V Daniels & Trenton P&DCs	NJ	Originating	(760,177)
15	EA	Kinston P&DF	NC	Fayetteville P&DC	NC	Originating	6,169,790
16	SW	Lakeland P&DC	FL	Tampa P&DC	FL	Originating	17,394,608
17	EA	Lima P&DF	OH	Toledo P&DC	OH	Orig&Dest	4,679,986
18	EA	London P&DF	KY	Lexington P&DC	KY	Originating	4,942,534
19	PA	Long Beach P&DC	CA	Santa Ana P&DC	CA	Originating	24,183,655
20	SW	Manasota P&DC	FL	Tampa P&DC	FL	Originating	27,193,595
21	PA	Marysville P&DF	CA	Sacramento P&DC	CA	Orig&Dest	3,464,026
22	PA	Mojave PO	CA	Bakersfield P&DC	CA	Destinating	4,571,231
23	EA	New Castle P&DF	PA	Pittsburgh P&DC	PA	Originating	15,142,415
24	NE	Newark P&DC	NJ	DVD P&DC	NJ	Destinating	38,160,143
25	PA	Oxnard P&DF	CA	Santa Clarita/Van Nuys P&DC	CA	Originating	1,925,650
26	NE	Portsmouth P&DF	NH	Manchester P&DC	NH	Originating	9,662,394
27	NE	Queens P&DC	NY	Brooklyn P&DC	NY	Originating	20,498,678
28	SW	South Florida P&DC	FL	Fort Lauderdale & Miami P&DCs	FL	Originating	48,042,827
29	NE	Staten Island P&DF	NY	Brooklyn P&DC	NY	Originating	8,654,099
30	NE	Watertown PO	NY	Syracuse P&DC	NY	Orig&Dest	11,586,942
31	NE	West Jersey P&DC	NJ	Northern NJ Metro & Kilmer P&DCs	NY	Destinating	27,832,979
32	NE	Western Nassau P&DC	NY	Mid-Island P&DC	NY	Originating	8,009,709
33	EA	Wheeling PO	WV	Pittsburgh P&DC	PA	Originating	20,496,369
34	EA	Wilkes-Barre P&DF	PA	Scranton & Lehigh Valley P&DCs	PA	Orig&Dest	15,972,105
35	CM	Winchester PO	VA	Dulles P&DC	VA	Orig&Dest	1,080,569
<b>TOTAL</b>							<b>\$466,749,190</b>

Source: US Postal Service Post-Implementation Reviews

**Area Abbreviations**

CM – Capital Metro.  
 EA – Eastern.  
 GL – Great Lakes.  
 NE – Northeast.  
 NY – New York.  
 PA – Pacific.  
 SE – Southeast.\*  
 SW – Southwest.\*  
 WE – Western.

**Facility/Type Abbreviations**

CSMPC – Customer Service Mail Processing Center.  
 PO – Post Office.  
 P&DC – Processing and Distribution Center.  
 P&DF – Processing and Distribution Facility.  
 Orig/Dest – Originating and Destinating.

\*Areas as noted on the PIRs; however, the Southeast and Southwest areas are now part of the Southern Area.

See following website for state abbreviations: <http://www.stateabbreviations.us/>

## Appendix D: Management's Comments

DAVID E. WILLIAMS  
VICE PRESIDENT, NETWORK OPERATIONS



September 24, 2012

LUCINE M. WILLIS  
DIRECTOR, AUDIT OPERATIONS

SUBJECT: Draft Audit Report – Post Implementation Review Process: Report Number CI-AR-12-DRAFT

Thank you for the opportunity to review and comment on the subject draft audit report. The recommendation in this draft report is addressed below.

Recommendation 1:

Improve the Post-Implementation Review process in Handbook PO-408, *Area Mail Processing Guidelines* to:

- Identify and separate savings and costs associated with other concurrent initiatives from savings and costs directly related to the area mail processing consolidation.
- Implement the use of automated data calculation and pre-population for post-implementation review worksheets and checklists.
- Establish a process to allocate savings and costs when multiple consolidations are made into the same gaining facility.
- Assess whether current post-implementation review timelines should be adjusted.

Management Response/Action Plan:

Management agrees in principle with this recommendation. Chapter 7 of Handbook PO-408, *Area Mail Processing (AMP) Guidelines* provides general information for conducting the Post-Implementation Review (PIR). Once the PIR process is modified we will update Handbook PO-408 to include the updated information. We will develop a separate PIR User's Guide, similar to the AMP User's Guide, which will contain the detailed processes for developing and completing a PIR.

The new PIR User's Guide will;

- Include guidelines to identify and separate savings and costs associated with other concurrent initiatives from savings and costs directly related to the area mail processing consolidation. These savings and costs will be restricted to those initiatives which are quantifiable.
- Include a process to allocate savings and costs when multiple consolidations are made into the same gaining facility.

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The PIR worksheets will be modified to utilize automated data calculation and pre-population where appropriate.

Management will review the current timeline for PIR processing and revise if necessary. We will modify the PO-408 if the time frames for completion of the PIR are adjusted.

Target Implementation Date:

March 2014.

Responsible Official:

Kurt Kramer, Acting Manager, Area Mail Processing and Facility Consolidation.

This report and management's response do not contain information that may be exempt from disclosure under the Freedom of Information Act (FOIA).



David E. Williams



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cc: Megan Brennan  
Corporate Audit and Response Management