

AUDIT REPORT

Timely Processing of Mail at the Boston, MA, Processing and Distribution Center

May 19, 2014





BACKGROUND:

HIGHLIGHTS

May 19, 2014

Timely Processing of Mail at the Boston, MA, Processing and Distribution Center

Report Number NO-AR-14-007

The majority of delayed mail was due to implementation errors associated with the Middlesex Essex P&DC consolidation. These errors included failure to update the Boston P&DC operating plan, acquire additional handling equipment, properly schedule employees, enforce proper color coding of mail, and properly supervise mail flow. Consequently, service scores in Boston declined and the percentage of carriers reporting back after 5 p.m. increased by 25 percent during FY 2014, Q1. We estimate that \$534,141 of Postal Service revenue is at risk as a result of these errors.

Excessive delayed mail adversely affects U.S. Postal Service customers and harms the organization's brand. The U.S. Postal Service Office of Inspector General's Performance and Risk Information Systems model identified the Greater Boston District as having significant delayed mail volume. The analysis of delayed mail during fiscal year (FY) 2014, Quarter (Q)1 identified the Boston Processing and Distribution Center (P&DC) as a facility with significantly more delayed mail compared to the same period last year.

The Boston P&DC began consolidating Middlesex Essex P&DC originating mail in April 2013. The P&DC consolidated destinating mail from the Middlesex Essex P&DC from August 2013 (FY 2013, Q4) to March 2014 (FY 2014, Q2).

Our objective was to determine whether the Boston P&DC processed mail on time.

WHAT THE OIG FOUND:

The Boston P&DC did not always process mail on time. The Boston P&DC had about 28 million delayed mailpieces in FY 2014, Q1, representing a 56 percent increase in delayed mail compared to the same period last year. Similarly sized facilities averaged about 8 million delayed mailpieces during the same period.

WHAT THE OIG RECOMMENDED:

We recommended the vice presidents. **Network Operations and Northeast** Area, expedite material handling requests for the Boston P&DC, update the Boston P&DC operating plan, adjust staffing and scheduling of employees, train employees on proper color coding, and train supervisors on expediting mail flow.

Link to review the entire report



May 19, 2014

MEMORANDUM FOR: DAVID E. WILLIAMS, JR.

VICE PRESIDENT, NETWORK OPERATIONS

RICHARD P. ULUSKI

VICE PRESIDENT, NORTHEAST AREA

E-Signed by Robert Batta
VERIFY authenticity with e-Sign

FROM: Robert J. Batta

Deputy Assistant Inspector General

for Mission Operations

SUBJECT: Audit Report – Timely Processing of Mail at the Boston,

MA, Processing and Distribution Center

(Report Number NO-AR-14-007)

This report presents the results of our audit on the Timely Processing of Mail at the Boston, MA, Processing and Distribution Center in the Greater Boston District in the Northeast Area (Project Number 14XG016NO000).

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

Attachment

cc: Corporate Audit and Response Management

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Introduction

This report presents the results of our self-initiated audit on the timely processing of mail at the Boston, MA, Processing and Distribution Center (P&DC) in the Greater Boston District in the Northeast Area (Project Number 14XG016NO000). Our objective was to determine whether the Boston P&DC processed mail on time. See Appendix A for additional information about this audit.

The Boston P&DC began consolidating Middlesex Essex P&DC mail in April 2013 using a two-phase approach. Overall, this consolidation resulted in a 57 percent increase in the Boston P&DC's mail volume. Consolidation of destinating mail from Middlesex Essex began in fiscal year (FY) 2013, Quarter (Q)4 (August 2013) and continued through FY 2014, Q2 (March 2014).

Conclusion

The U.S. Postal Service Office of Inspector General (OIG) found the Boston P&DC did not always process mail on time. The Boston P&DC had about 28 million delayed mailpieces in FY 2014, Q1. This is a 56 percent increase in delayed mail from the same period last year (SPLY). The majority of delayed mail was due to implementation errors associated with the Middlesex Essex P&DC consolidation, which included failure to update the Boston P&DC operating plan, acquire additional material handling equipment, properly schedule employees, enforce proper color coding of mail, and properly supervise mail flow. Consequently, service scores in Boston declined and the percentage of carriers reporting back after 5 p.m. increased. We estimate that \$534,141 of U.S. Postal Service revenue is at risk as a result of these errors.

Delayed Mail

The Boston P&DC experienced a significant increase in delayed mail volume during FY 2014, Q1 compared to the SPLY. Delayed mail volume increased from 18.1 million pieces in FY 2013, Q1 to 28.4 million pieces in FY 2014, Q1. This represented an increase in delayed mail of over 56 percent and represented 5.6 percent of total first-handling pieces (FHP)¹ volume (see Table 1).

¹ A letter, flat, or parcel that receives initial distribution at a postal facility. FHP records mail volume in the operation where it receives its first distribution handling.

Table 1. Boston P&DC Delayed Mail Trend

Year	Mailpieces
FY 2013, Q1	18,180,355
FY 2014, Q1	28,407,283
Percentage change	56.25%

Source: Enterprise Data Warehouse (EDW).

The Boston P&DC ranked high in delayed mail compared to 40 similarly sized facilities. For example, in FY 2014, Q1 the Boston P&DC:

- Had 28.4 million delayed mailpieces and ranked third highest among the 40 similarly sized plants.
- Had 1.4 million delayed First-Class[®] mailpieces and ranked seventh highest among similarly sized plants.
- Had 26.9 million delayed pieces of Standard Mail and ranked third highest among similarly sized plants.
- Experienced more than a 56 percent increase in overall delayed mail from the SPLY.

We found that a significant volume of delayed mail continued into FY 2014, Q2. We compared delayed mail as a percentage of FHP to similarly sized facilities and found that in FY 2014, Q2, the Boston P&DC had almost three times as much delayed mail as its counterparts (see Table 2).

Table 2: Delayed Mail Comparison

		entage of FHP onsolidation	Delayed Perce After Cons	
	FY 2013, Q1	FY 2013, Q1 FY 2013, Q2		FY 2014, Q2
Boston P&DC	5.61%	0.71%	5.58%	7.35%
Average of Similarly Sized Facilities	2.30%	0.30%	3.05%	2.61%

Source: EDW.

During our week of observations, we found a large amount of delayed mail at the manual letter case operation (see Figure 1). During our audit, management took corrective action to process this mail.



Figure 1: Delayed Mail Manual Letter Cases

Source: Photographs taken January 21, 2014, at 7 p.m.

There were also no areas dedicated to staging mail, making it difficult to process mail in the first in, first out (FIFO) manner required by Postal Service policy.² We found instances where employees did not stage mail in the order it arrived, further delaying processing of some mail (see Figure 2).



Figure 2: Delayed Mail Automation Area

Source: Photographs taken January 21, 2014, at 9 p.m.³

² National color code policy ensures the timely processing, dispatch, and delivery of Standard Mail while meeting established service standards.

³ Poorly staged letter mail destined for Delivery Barcode Sorter (DBCS) operation, which included delayed mail.

The oldest mail was staged in the back.

Implementation

The primary reasons for excessive delayed mail were implementation errors associated with the Middlesex Essex P&DC consolidation, which included failure to update the Boston P&DC operating plan, acquire additional material handling equipment, properly schedule employees, enforce proper color coding of mail, and properly supervise mail flow.

Operating Plan

The Boston P&DC did not update its official operating plan, including arrival and clearance times, to take the Middlesex Essex P&DC consolidation into account. Consequently, employees did not have the information to sufficiently plan mail flow to avoid delays.

An updated operating plan would give management an overview of the time of mail arrival and the amount of mail projected to be cancelled. Mail arriving at the Boston P&DC for cancellation was arriving at about 11 p.m. which was too late for timely processing. Additionally, this resulted in transportation departure delays that caused more carriers to return after 5 p.m. Specifically, we found that operations were consistently missing established goals as measured by 24-Hour Clock indicators (see Tables 5, 6, and 7). For example, cancellation operations at the Boston P&DC were consistently idle at peak processing times due to a lack of mail available from local stations and branches (see Figure 3).



Figure 3: Cancellation Operation

Course. I notograph taken candary 22, 2011, at 7 p.m.

⁴ No mail available to be run on Advanced Facer Canceller System (AFCS) machines.

Mail Handling Equipment

The Boston P&DC had sufficient machine capacity to process its mail on time; however, using additional material handling equipment could shorten the mail processing time, thereby reducing the amount of delayed mail.

The Boston P&DC has four floors and limited material handling equipment to expedite mail flow to machines on the various floors. We found that many machines were idle because mail was not available to process (see Table 3). A High-Speed Tray Sorter, Robotic Container System, and Tray Take-Away System are examples of material handling equipment that would make more mail available at various machine operations. Management had already taken action to acquire the additional equipment.

Table 3: Machine Idle Time

SUMMARY - FY 2014, Q1					
Machine	loventory	Run	Idle	Down	Maintenance
iviacrime	Inventory	Time	Time	Time	Time ⁵
AFSC System	11	47%	33%	0%	20%
Automated Flat Sorter Machine	4	87%	3%	11%	0%
Automated Package Processing	1	90%	9%	1%	0%
System					
Delivery Barcode System	51	55%	39%	6%	0%
Delivery Input Output Sub-System	10	51%	40%	8%	0%

Source: Web End-of-Run (WebEOR). Percentages are rounded, causing some totals not to equal 100 percent.

Staffing and Scheduling

Employees were not always available to process mail at peak times. Specifically, during outgoing operations management did not always staff manual letter cases, causing mail to accumulate and, ultimately, be delayed. Additionally, management did not consistently staff automated machines during peak processing times, which could delay mail (see Figure 4).

⁵ Maintenance time does not include preventative time spent on the machines.



Figure 4: Unstaffed Automated Machines

Source: Photograph taken January 23, 2014, at 4 a.m. during peak processing time of Delivery Point Sequencing. ⁶

Color Coding

The majority of Standard Mail did not possess a properly completed color code tag that identified the date and time of arrival. We reviewed a total of 623 containers during our week of observing Standard Mail for compliance with national color code policy. Only three of these containers had properly completed color code tags with a date and time of arrival. This represents a less than 1 percent compliance rate. As a result, we could not distinguish what day and week the mail had arrived and how much was being processed in a FIFO manner.

We interviewed craft employees and supervisors in mail processing about the national color code policy and found that they all possessed only a minimal understanding of the policy. Training records revealed that only 56 of the 898 employees had taken color code training since 2011.

Supervision

Insufficient supervision also contributed to mail processing delays. For example, supervisors did not always adjust staffing and sort plans and ensure proper staffing of each operation. Additionally, some supervisors did not promptly assess mail volume and adjust workhours, assignments, and sort plans to ensure the Boston P&DC met customer service commitments. We did not find all the employees to be actively engaged in their work assignments, which led to delayed mail volume.

Supervisors also did not enforce proper mail identification by using the color code system. This routinely led to employees staging mail throughout the building with no indication where it should be transported for final distribution. Also, management filled

⁶ Machines were left idle after ledge ran out of mail even though an ample supply of mail was available.

14.63 percent of authorized supervisor positions with acting supervisors⁷ or left them vacant, contributing to poor supervision.

Overall Impact

As a result of delayed mail in the Greater Boston District, customer service declined. For example, Greater Boston District External First Class (EXFC) service scores declined compared to the SPLY in all three categories measured. Three-day mail was particularly impacted, with a 4.32 percentage point decrease in Boston and a 7.92 percentage point decrease in Middlesex (see Table 4).

Table 4: External First-Class Service Scores

	Overnight		2-Day Mail		3-Day Mail	
	FY 2013, Q1	FY 2014, Q1	FY 2013, Q1	FY 2014, Q1	FY 2013, Q1	FY 2014, Q1
Boston P&DC	96.56	96.28	93.41	92.89	88.47	84.15
Middlesex P&DC	93.73	90.67	93.88	94.37	88.98	81.06

Source: EDW.

Delayed mail caused more carriers to return after 5 p.m. Specifically, we found:

- Forty percent of Boston carriers were returning late (after 5 p.m.), representing an increase of almost 28 percent over the SPLY.
- Fifty percent of Middlesex carriers were returning late (after 5 p.m.), representing an increase of almost 25 percent over the SPLY.

Recommendations

We recommend the vice president, Network Operations:

 Expedite existing material handling requests for the Boston Processing and Distribution Center that include a High-Speed Tray Sorter, Robotic Container System, and Tray Take-Away System.

We recommend the vice president, Northeast Area:

2. Update the Boston Processing and Distribution Center's operating plan to accurately reflect consolidations and to improve the incoming mail arrival profile.

⁷ A craft employee working as a supervisor or detailed to an Executive and Administrative Schedule position.

- 3. Adjust scheduling of employees to accommodate mail volume and allow employees to be available at peak processing times.
- 4. Train employees and supervisors on proper color coding procedures.
- 5. Properly train supervisors on expediting mail flow throughout the facility.

Management's Comments

Management agreed with our findings and recommendations.

In response to recommendation 1, management has submitted the material handling request to headquarters for evaluation. The target completion date is September 15, 2014.

In response to recommendation 2, management has aligned the operating plan for the Boston P&DC to meet national 24-Hour Clock indicators.

In response to recommendation 3, management has the complement alignment in process to improve mail processing. The target completion date is June 30, 2014.

In response to recommendation 4, management has recently provided training but will continue refresher training quarterly.

In response to recommendation 5, management is proceeding with a Lean Six Sigma processing initiative for efficiency improvements and facility layout realignments. Management will also conduct tour turnover discussions daily and is installing staging designations along with operational signage. The target completion date is May 30, 2014.

See Appendix C 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 considers recommendations 1, 2, and 4 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

The Boston P&DC is in the Greater Boston District in the Northeast Area. The Postal Service owns the facility, which covers 1.2 million square feet. The facility consists of four floors and is equipped with three passenger elevators and nine freight elevators. The following map shows the Northeast Area districts by 3-digit ZIP Code™.

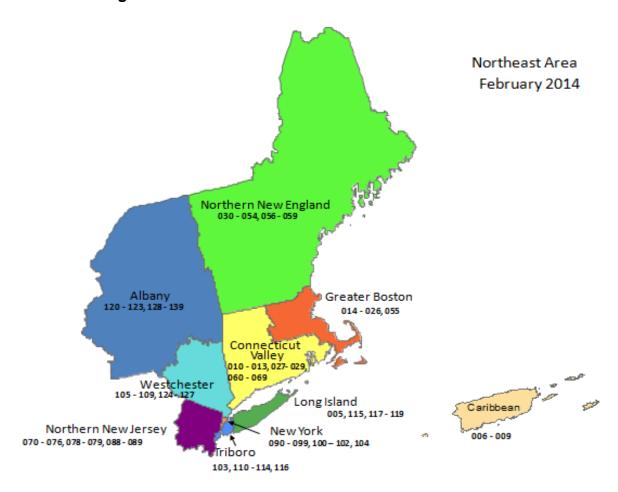


Figure 5: Districts with ZIP Codes in the Northeast Area

Excessive delayed mail adversely affects Postal Service customers. The Postal Service considers mail to be delayed when it is not processed or dispatched to meet its established delivery day. A review of the OIG's Performance and Risk Information Systems (PARIS) model⁸ identified the Greater Boston District as one with significant delayed mail volume.

⁸ The PARIS model identifies districts at risk from an operational standpoint.

Area Mail Processing

In 2008, the Postal Service revised Handbook PO-408 to improve the consistency of data and the process of implementing consolidations. Area Mail Processing consolidations are designed to make more efficient use of Postal Service assets, such as equipment, facilities, staffing, and transportation; improve operational efficiency or service; and eliminate excess mail processing capacity at Postal Service facilities. An AMP may involve consolidating originating operations (canceling and sorting locally generated mail), destinating operations (mail that originates outside the local area), or both.

The *President's Commission on the U.S. Postal Service* report, dated July 31, 2003, states that the mission of the Postal Service is:

". . . to provide high-quality, essential postal services to all persons and communities by the most cost-effective and efficient means possible at affordable and, where appropriate, uniform rates."

Title 39 U.S.C., Part 1, Chapter 4, §403, states:

"The Postal Service shall plan, develop, promote, and provide adequate and efficient postal services at fair and reasonable rates and fees."

Objective, Scope, and Methodology

Our objective was to determine whether employees at the Boston P&DC processed mail in a timely manner. To meet our objective, we conducted interviews and examined applicable Postal Service policies and procedures and analyzed mail volume, workhours, and machine run times. We also analyzed trends and conducted observations at the Boston P&DC.

We conducted this performance audit from January through May 2014, 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 January 23, 2014, and included their comments where appropriate.

To conduct this audit, we relied on computer-processed data maintained by Postal Service operations systems, which included the Mail Condition Reporting System, EDW System, Web Complement Information System, WebEOR System, and Management Operating Data System. We did not test the validity of controls over these systems; however, we verified the accuracy of the data by confirming our analysis and results

with Postal Service managers. We determined that the data were sufficiently reliable for the purposes of this report.

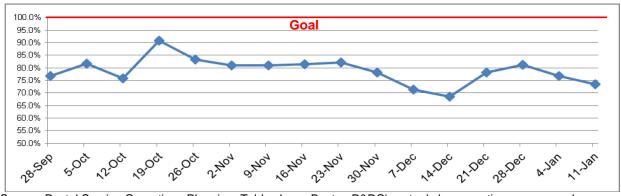
24-Hour Clock Indicators

Table 5: Cancellation – 24-Hour Clock Performance



Source: Postal Service Operations Planning. Table shows Boston P&DC's actual clearance time versus goal.

Table 6: Outgoing Operation – 24-Hour Clock Performance



Source: Postal Service Operations Planning. Table shows Boston P&DC's actual clearance time versus goal.

Table 7: On-Time Transportation – 24-Hour Clock Performance



Source: Postal Service Operations Planning. Table shows Boston P&DC's actual clearance time versus goal.

Prior Audit Coverage

Report Title	Report Number	Final Report Date	Monetary Impact (in millions)
Timeliness of Mail Processing at the Hartford, CT, Processing and Distribution Center	NO-AR-13-009	9/30/2013	None

Report Results:

Our report found the Hartford P&DC experienced difficulties processing First-Class and Standard Mail on time during FY 2013, Qs 1 and 2. For example, the Hartford P&DC delayed 34.4 million mailpieces and had the highest amount of delayed First-Class Mail and the second highest amount of delayed Standard Mail compared to similarly sized facilities. About 37 percent of the delayed mail was the result of severe weather, which included Hurricane Sandy in October 2012 and a blizzard in February 2013. However, the majority of the delayed mail was due to two major operational issues. Consequently, service scores declined and there was an increased risk that some customers would seek alternative delivery or advertising methods that could result in revenue loss. We recommended adjusting planning and scheduling to accommodate mail volume, especially during holiday periods and ensure mail arrives earlier at the plant so that it can be processed timely. Management agreed with the recommendation.

Timeliness of Mail Processing	NO-AR-12-010	9/28/2012	\$17,330,587
at Processing and			
Distribution Centers			

Report Results:

Our report found that, in FY 2012, the Postal Service made significant progress reducing the amount of delayed mail at its 43 largest P&DCs and improved service performance scores measured by the Intelligent Mail Accuracy and Performance System. Through FY 2012, Q3 about 1.4 billion mailpieces have been delayed, while about 3.5 billion pieces were delayed in FY 2011. We identified issues that contributed to mail delays, including improper color coding, inaccurate reporting, underused automation, floor congestion, incomplete operating plans, and a lack of mail inventory visibility. We recommended the Postal Service evaluate operations to reduce delayed mail in the network and ensure that field personnel are properly trained in color-coding Standard Mail and counting and reporting delayed mail in accordance with policies. We also recommended the Postal Service increase investment in and employee access to the tools necessary to assist in identifying potential mail processing problems that could result in delayed mail. Management agreed with our recommendations.

Report Title	Report Number	Final Report Date	Monetary Impact (in millions)
Timely Processing of Mail at the Pittsburgh, PA, Processing and Distribution Center	NO-AR-12-008	9/18/2012	None

Report Results:

Our report found that the Pittsburgh P&DC experienced difficulty with timely processing of all mail in FY 2011, the bulk of it being Standard Mail. Among the 43 largest Postal Service facilities, the Pittsburgh P&DC ranked second highest, with more than 12 percent delayed mail volume. We recommended the Postal Service adjust workhours, assignments, and other operational requirements to ensure the Pittsburgh P&DC processes mail timely compared to similarly sized sites. We also recommended the Postal Service increase the capacity and throughput of tray sorters, expand the windows of operation, improve mail flow throughout the facility, and train employees to ensure proper color-coding of Standard Mail, according to Postal Service policy. Management agreed with our recommendations.

Timely Processing of Mail at the Richmond, VA,	NO-AR-11-008	9/13/2011	None
Processing and Distribution Center			

Report Results:

Our report found that the Richmond P&DC experienced difficulties with timely processing of mail during FY 2010 and FY 2011, Q1. Delayed mail volume rose from 22.6 million pieces to 54.2 million pieces over a 2-year period. We recommended the Postal Service promptly assess the current mail volume and adjust workhours, assignments, sort plans, transportation, and other operational requirements to ensure the Richmond P&DC meets customer and service commitments. Management agreed with our recommendations

Appendix B: Other Impact

Recommendation	Impact Category	Amount
1	Revenue at Risk ⁹	\$534,141

To calculate total revenue at risk, we conservatively estimated that 10 percent of the mail volume delayed during FY 2013 is at risk of being diverted to a method of delivery other than the Postal Service. We determined that 2,425,653 mailpieces — or \$534,141 of revenue associated with the delayed mailpieces — are at risk of loss.

Other Impact Amounts

Mail Classification	Amount
First-Class Mail ¹⁰	\$66,422
Standard Mail ¹¹	467,719
Total	\$534,141

⁹ Revenue the Postal Service is at risk of losing by not providing timely delivery. For example, a mailer is dissatisfied with mail delivery and seeks alternative solutions for services the Postal Service provides.

10 We conservatively estimated revenue at risk for First-Class mailers selecting alternative delivery methods as 10

¹⁰ We conservatively estimated revenue at risk for First-Class mailers selecting alternative delivery methods as 10 percent of total delayed First-Class Mail by using the average revenue per mailpiece of about 44 cents (1,501,574 x .10 = 150.157 x .442345 = \$66.422).

^{.10 = 150,157} x .442345 = \$66,422).

11 We conservatively estimated revenue at risk for mailers selecting alternative delivery methods as 10 percent of total delayed Standard Mail multiplied by the average revenue per mailpiece of about 21 cents (22,754,956 x .10 = 2,275,496 x .205546 = \$467,719).

Appendix C: Management's Comments



May 8, 2014

JUDITH LEONHARDT

SUBJECT: Response to Draft Audit Report-Timely Processing of Mail at the Boston, MA Processing and Distribution Center (Report Number

NO-AR-14-DRAFT)

Thank you for providing the Postal Service with the opportunity to review and comment on the subject draft report. Management has reviewed the findings and recommendations, and has addressed each separately below.

Recommendation 1: Expedite existing material handling requests for the Boston Processing & Distribution Center that include a High-Speed Tray Sorter, Robotic Container System, and Tray Take-Away System.

Management Response: Management agrees. Material Handling requests have been submitted to Headquarters and are currently under evaluation.

Target Implementation Date: September 15, 2014

Responsible Manager: Manager, Network Operations Engineering

Recommendation 2: Update the Boston Processing and Distribution Center's operating plan to accurately reflect consolidations and to improve the incoming mail arrival profile.

Management Response: Management agrees. Boston Processing and Distribution Center's operating plan has been aligned to meet the National 24 Hour Clock indicator measurements.

Target Implementation Date: April 18, 2014

Responsible Manager: Manager, Boston Processing and Distribution Center

475 L'Enfant Plaza SW Washington, DC 20260 Recommendation 3: Adjust scheduling of employees to accommodate mail volume and allow employees to be available at peak processing times.

<u>Management Response</u>: Management agrees. Complement alignment is currently in process to meet the new operating plan and processing windows to improve the operational processing and clearance times.

Target Implementation Date: June 30, 2014

Responsible Manager: Manager, Boston Processing and Distribution Center

Recommendation 4: Train employees and supervisors on proper color-coding procedures.

<u>Management Response</u>: Management agrees. Boston Processing and Distribution Center has completed numerous training sessions of employees and supervisors on Color Coding procedures. Most recent training updates were on February 3, 2014 and refresher training will continue on a quarterly basis and as new employees are hired within the facility.

Target Implementation Date: February 3, 2014 and continues as needed

Responsible Manager: Manager, Boston Processing and Distribution Center

<u>Recommendation 5</u>: Properly train supervisors on expediting mail flow throughout the facility.

Management Response: Management agrees. As we proceed with the Lean Mail Processing initiative for efficiency improvements and facility layout realignments, daily tour turnover discussions are taking place with all supervisors and managers. Staging area designations and operational signage is being installed for better visibility and for compliance to mail flow improvements throughout the facility. Adjustments as needed will continue to take place until full completion of Area Mail Processing studies that remain in effect.

Target Implementation Date: May 30, 2014

Responsible Manager: Manager, Boston Processing and Distribution Center If you have any questions about this response, please contact Linda Malone at (202) 268-5556 or Henry Dominguez at (202) 268-5911.

This report and management's response does contain proprietary or sensitive business information that may be exempt from disclosure pursuant to the

Freedom of Information Act. Specifically we request that the information that is both class specific and site specific be redacted when this report is made publically available. The following two bullets are to be redacted.

- Had a total of 1.4 million delayed First-Class[®] mailpieces and ranked the seventh highest among similarly sized plants.
- Had a total of 26.9 million delayed pieces of Standard Mail and ranked the third highest among similarly sized plants.

David Williams

Vice President, Network Operations

Richard P. Uluski

Area Vice President, Northeast Area

cc: CARM