

Before the  
POSTAL REGULATORY COMMISSION  
Washington, DC 20268-0001

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Mail Processing Network Rationalization ) Docket No. N2012-1  
Service Changes, 2012 )  
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**DIRECT TESTIMONY OF CHRISTOPHER BENTLEY  
ON BEHALF OF THE NATIONAL POSTAL MAIL HANDLERS UNION  
(NPMHU-T-3)**

My name is Christopher Bentley. I am currently a Mail Handler employed by the United States Postal Service at the Springfield, Missouri P&DC. I am also currently Vice President of Local 297 of the National Postal Mail Handlers Union (NPMHU), which represents approximately 850 Mail Handlers in the states of Missouri and Kansas. I also serve as the Branch President of the NPMHU's Springfield branch. I have worked at the Springfield P&DC since 1998, my entire Postal career.

The purpose of my testimony is to provide additional information to the Commission regarding one of the Postal Service's proposed consolidations—the consolidation of the Springfield, Missouri P&DC into the Kansas City, Missouri P&DC. Based on my knowledge of these facilities, my many years as a Postal employee, and my review of the Area Mail Processing (AMP) study of this consolidation, I believe that the Postal Service has underestimated the costs of this consolidation and the negative effects it will have on the efficient delivery of the mail.

1. Logistical Problems with Consolidating Springfield Into Kansas City.

Compared to Springfield, Kansas City is a less efficient facility and is already at capacity with mail volume. The Kansas City facility processes mail on three different floors. Its elevators are already at capacity at mail-dispatch time, as even management admitted in its AMP study report (page 45). This means that adding any more mail to the facility is counter-productive because it will clog the system, slowing down delivery times even for mail that Kansas City already processes, as well as the new mail that would be added to the facility. In addition to the Springfield consolidation, the Postal Service has also approved an AMP study to consolidate the originating and destinating mail from the Topeka, Kansas P&DF into the Kansas City P&DC, which will add about 884,454 in daily volume FHP to Kansas City (about a 14% increase). See <http://about.usps.com/streamlining-operations/topeka-final-redacted.pdf>. I am informed that this Topeka consolidation will likely occur over the summer of 2012. According to the AMP, the Springfield consolidation would add another 1,631,891 in daily volume FHP, which would constitute an additional 26% increase in volume. Kansas City is already struggling, as shown by the 24-hour clock included on page 9 of the Springfield AMP study – all of the “Trips on Time” for Kansas City are in the red alert zone, as are about half of the “OGS cleared by 2400,” and all of the “Mail Assigned Commercial/Fed Ex by 2300” are in the yellow warning category.

In contrast, the Springfield facility is on a single floor and is a very efficient facility, with some of the highest productivity numbers in the country. In 2011, the Springfield facility qualified for the Tovar Award, a rare designation reserved for facilities that consistently cancel 80 percent of their collection mail before 8 p.m. No other Postal facility in the USPS Mid-America District – including Kansas City – has qualified for this award. Springfield consistently achieves nearly perfect EXFC scores, a measure of on-time, accurate delivery for first-class mail, scoring between 97% and 100% every day. Kansas City’s EXFC scores are almost always much lower.

In addition, I do not believe that the Postal Service has adequately planned for the transportation challenges involved in moving the mail between Springfield and Kansas City, a distance of 167 miles. There are two roads between the two facilities, both state highways (not interstates). The main road is Missouri Highway 13, known as “Bloody 13.” At the best of time and with minimal traffic, this trip takes over three hours. In the winter, these roads are often icy and the trip may take much longer or be impossible altogether. Indeed, in the past five years, we have had three storms (January 2007, January 2009, and January-February 2011) that reached the national disaster level, during which travel between Springfield and Kansas City was shut down for a significant period of time—sometimes as much as a week.

I also do not believe that the Postal Service has adequately accounted for the stress on the mail processing equipment in Kansas City that will result from substantially increasing the number of hours that they run, and the mail volume that they process. In my experience, when Postal machines run more than four to six hours a day, they break down very frequently. The Postal Service’s plan to run processing machines 20 hours per day will likely lead to additional break-downs, which will decrease the efficiency of the Kansas City facility and may slow down mail delivery even beyond the anticipated service standard changes.

## 2. The Demographics of Springfield Area Argue for a Local Mail Processing Facility.

The area serviced by the Springfield P&DC, including Branson and Joplin, Missouri, is one of the top 10 fastest growing regions in the Country, according to recent U.S. Census data. This area is also one of the few in the country experiencing economic growth. While mail volume is declining across the country, letter cancellations in the Springfield P&DC have actually increased. In July 2011, Postal management began sending Springfield’s Saturday mail to be cancelled and processed in Kansas City, meaning that Springfield now cancels letters only five days per week instead of six. Despite the loss of one day of mail each week, Springfield’s monthly cancellation numbers stayed the same – between 5.5 million and 6 million

letters. In February 2012, Springfield's letter cancellations increased by 308,000 letters over the same month in 2011, jumping from 5.2 million letters to 5.5 million, even though there were three fewer cancellation days this year. I see no evidence that the Postal Service considered these important factors in its decision. Given this demographic and economic growth, it makes sense to keep the mail processing in Springfield, to service these new businesses.

Springfield's service area is about twice as big as Kansas City P&DC's service area by square mileage, and Springfield also services more unique zip codes than any other facility in the country. This includes many small, rural communities. Due to the number of zip codes serviced by Springfield, it is necessary to change the set-ups for the mail processing equipment more frequently. While the Postal Service may have looked at mail volume in considering the consolidation, it does not appear that it looked at the number of zip codes serviced, or the amount of mail-processing work required. I am very concerned that Kansas City will not be able to handle the additional set-ups efficiently.

Moreover, residents of rural communities often depend heavily upon the mail and often have lower internet usage and access. By moving the facility away from Springfield, those rural residents will suffer, as they wait for important mail to be moved from their community to Kansas City and back.

### 3. The AMP Underestimates Costs.

In reviewing the AMP study for Springfield, I noted several areas in which the Postal Service appears to have under-estimated the costs of this consolidation. First, although the AMP states that there will be a net gain of an additional seven management positions in the consolidation (with a loss of fifteen positions in Springfield and an additional twenty-two positions needed in Kansas City, see pages 32-35), the study also anticipates a savings in management costs of \$1.12 million (see page 31)—a savings that simply cannot be true in any real sense, if seven additional positions will be needed.

Second, the Springfield AMP states that the facility will remain open as a hub, but the AMP states that only 29 Function 4 clerks will work the docks, with no Mail Handlers, despite the fact that this is Mail Handler work. The Postal Service's AMP study states all 93 of Springfield's current Mail Handlers will need to be transferred to Kansas City, so abiding by the labor agreements will mean that management must hire 29 new Mail Handlers to work on the Springfield docks – which will further increase the cost of the consolidation.

It appears that the Postal Service has drastically under-stated the labor expenses that will be associated with operating this hub. Since July 4, 2011, the Postal Service has been sending Springfield's Saturday mail to be processed in Kansas City. On Saturdays, Springfield therefore operates basically as a hub, sending the mail along to Kansas City. This has eliminated work such as cancellations, but it has created new work of mail sortations, consolidations, and transfers to load the mail onto trucks to go to Kansas City. Since moving Saturday mail to Kansas City, we have seen an increase in Mail Handlers' Saturday work-hours, resulting in increased overtime call-ins for the hours between 4:00 p.m. and 10:00 p.m., the period when the trucks are loaded and sent to Kansas City. The typical staffing for a Saturday is about 15 Mail Handlers, but since we began sending the Saturday mail to Kansas City, the Postal Service usually brings in three to six additional Mail Handlers on overtime each Saturday. Throughout 2012, the Postal Service also has employed three "casuals," or temporary non-career Mail Handlers, and has scheduled them to work every Saturday, too. This brings the total staffing on a Saturday to between 21 and 24 Mail Handlers, an increase of 40% to 60% above normal staffing. Keep in mind that Saturday is traditionally the lightest mail day of the week, with about 175,000 letters canceled. Mondays, for example, usually have about twice as much mail, with letter cancellations over 300,000. Given these figures, I expect that sending Springfield's mail to Kansas City every day would require additional labor in numbers far higher than the Postal Service has estimated.

Third, the study dramatically under-estimates the increased maintenance costs in Kansas City. The report states that almost a dozen large pieces of machinery will need to be added in Kansas City (see page 8), and estimates that the Postal Service will save \$2,495,191 by not having to maintain equipment in Springfield --- yet the AMP does not budget a single additional dollar for maintenance of mail processing equipment in Kansas City (see page 37). It is simply unbelievable that the Postal Service could add many more pieces of equipment, and increase the amount of mail processed by about 40%, yet not incur additional maintenance costs. It is also inexplicable how the Springfield facility can remain open for retail, BMEU and hub operations, yet not require a single dollar to be spent on any sort of equipment maintenance, maintenance operations support, or training.

Fourth, the study under-estimates the financial costs of relocating employees to Kansas City (to say nothing of the personal costs of such a move). On page 45 of the report, the report budgets \$465,000 for relocation. However, the report states that 22 management and 212 craft employees will be added to Kansas City (pp. 35-36) – based upon USPS average relocation costs of about \$5500 per employee, this number should be about \$1.3 million.

The Postal Service has budgeted \$6.65 million to renovate the Kansas City facility in order to enable it to do the work that Springfield is already doing—and doing very well—at a facility owned by the Postal Service and which requires no renovations. This appears to be only a rough estimate, and is already double what management first estimated at Labor-Management meetings in December 2011 and January 2012. Given that the savings involved have been radically over-estimated, it is likely that the costs involved in renovating Kansas City will quickly eat up any savings. The renovations also likely will hurt productivity and slow mail delivery to Kansas City-area customers, because the extensive construction required, including adding big freight elevators to the existing structure, will mean that Kansas City's mail will have to be processed for several months in a working construction site.

The Postal Service has claimed that the consolidations will create longer operating windows, which will allow them to accomplish the same amount of work using fewer employees. Based on my experience in the Postal Service, this is completely contrary to the facts. Trucks still have to be loaded and unloaded one piece of equipment at a time. Letters and packages still have to be sorted and run through processing machines one piece of mail at a time. The mail volume will stay the same, and the machines will require the same staffing, so the work will still require the same amount of time and the same number of employees. The main changes will be longer transportation times to and from the plants, and the processing machines will be expected to operate up to 20 hours per day, instead of six to eight hours. Logically, this will mean they will break down more often, just as a car would if you drove it 20 hours per day. Postal machines are complex devices, with hundreds of belts, gates, switches, conveyors, and other moving parts, any of which can and do break or wear out fairly often. Customers often put objects in envelopes that jam Postal machines, such as keys, pencils, knives, jewelry, and coins. This creates a small problem when a machine that was scheduled to run six hours shuts down unexpectedly, forcing Postal workers to find an alternative method of processing maybe 25,000 pieces of mail. Imagine the disaster when a machine that was supposed to run 20 hours breaks down, displacing hundreds of thousands of pieces of mail. Consolidating the mail also consolidates the problems and difficulties of processing it. I expect longer operating windows will decrease efficiency and provide worse service to the American people.

Respectfully submitted,

Patrick T. Johnson

*As agent for and authorized by*

Andrew D. Roth

Kathleen M. Keller

Bredhoff & Kaiser, P.L.L.C.

805 Fifteenth Street, N.W.

Suite 1000

Washington, DC 20005

(202) 842-2600

*Counsel for National Postal*

*Mail Handlers Union*

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