

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268

DSCF STANDARD MAIL LOAD LEVELING

Docket No. N2014-1

**RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS ANDERSON
TO PUBLIC REPRESENTATIVE INTERROGATORIES
(PR/USPS-T2-1, 2(A) & (B), 3, AND 4)**

The United States Postal Service today files the responses of witness Mark Anderson to the above-identified interrogatories of the Public Representative, dated January 3, 2014. Interrogatory PR/USPS-T2—2(c) has been redirected to the Postal Service for an institutional response. The interrogatories are stated verbatim and followed by the response.

Respectfully submitted,

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January 10, 2013

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS ANDERSON
TO PUBLIC REPRESENTATIVE INTERROGATORY**

PR/USPS-T2- 1

On pages 1-2 of your testimony, you describe the postal demographics of the South Jersey District.

- a. How do these demographics make the results of the South Jersey Operations Test representative of the likely effects of a nationwide implementation of load level planning?
- b. In what ways do the postal demographics of the South Jersey District fail to be representative of the nation as a whole?

RESPONSE

a-b. The purpose of the description of the South Jersey District in my testimony was to provide background and context to the South Jersey Operations Test, and this description was not included to provide any representation of the South Jersey District to the nation as a whole. The Postal Service's choice for the South Jersey District in which to conduct the South Jersey Operations Test is described on page 12 of the testimony of witness Malone (USPS-T1).

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS ANDERSON
TO PUBLIC REPRESENTATIVE INTERROGATORY**

PR/USPS-T2- 2

On page 4 of your testimony, you discuss the reduction in overtime hours and carriers out past 1700 on Mondays in Ocean City during the South Jersey Operations Test, as compared to the previous week.

- a. How do mail delivery volumes in the South Jersey District’s tourist communities, like Ocean City, generally change in the weeks that follow Labor Day weekend each year?
- b. Please provide a comparison of carrier overtime hours and carriers out past 1700 on Mondays during the South Jersey Operations Test and during the dates September 12, 2012 and September 27, 2012.
- c. Please provide USPS-LR-N2014-1/2 DOIS data by day of the week from August 1, 2012 to September 30, 2012, in the same format as File “SJ F2 Results.xls” tab “Data”. Please provide this data disaggregated by route.

RESPONSE

a. The delivery volumes in the South Jersey District’s tourist communities, like Ocean City, generally remain constant in the weeks that follow Labor Day weekend each year.

b. In consultation with the Public Representative, she clarified to Postal Service counsel that she was not requesting data for September 12, 2012, and September 27, 2012, but was in fact requesting data for the Mondays between those dates, September 17, 2012, and September 24, 2012. Those data are included in the table below.

Date	Carrier Overtime Hours	Carriers Out Past 1700
September 17, 2012	14.41	6
September 24, 2012	1.40	0
September 16, 2013	2.09	0
September 23, 2013	3.10	0

c. This interrogatory subpart has been redirected to the Postal Service for an institutional response.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS ANDERSON
TO PUBLIC REPRESENTATIVE INTERROGATORY**

PR/USPS-T2-3

On pages 6 of your testimony, you stated that “[c]ertain locations indicated that the increase in Tuesday Standard Mail volume resulted in increased Tuesday workload” and explained that “Postal Service management in the South Jersey District will evaluate the qualitative information received about Tuesday workload with the quantitative data to ensure balanced delivery loads.”

- a. Please identify, describe, and provide all documents detailing the qualitative information received about Tuesday workloads during the South Jersey Operations Test.
- b. Please identify, describe, and provide all documents detailing the quantitative data concerning Tuesday workloads during the South Jersey Operations Test.
- c. Has Postal Service management in the South Jersey District evaluated the qualitative information received about Tuesday workloads with the quantitative data from the South Jersey Operations Test?
- d. If your response to part (c) is in the affirmative, please identify, describe, and provide all documents related to that evaluation.
- e. If your response to part (c) is in the negative, when does the Postal Service management in the South Jersey District expect to conduct the evaluation of the qualitative and quantitative information concerning Tuesday workloads during the South Jersey Operations Test?

RESPONSE

a-b. In addition to that information already provided in the testimonies of witnesses Malone and Anderson and USPS-LR-N2014-1/2, qualitative information received about and quantitative data concerning Tuesday workload during the South Jersey Operations Test is provided in the attachment to this response.

- c. The Postal Service has begun an informal evaluation of the information received about Tuesday workloads during the South Jersey Operations Test.
- d. I have no documents responsive to this request.
- e. Not applicable.

Pluses and Delta's and Comments from the Load Leveling Test Period

Load Leveling Plus & Delta

PLUS	DELTA
Mail flow good, even. Not large variation in actual workhours	Tweak mail flow Mon / Tues
Reduced 1700. Good mail flow in DPS	Even out Flats on Mon / Tues
Change in attitude in Mgrs/Clerks/Carriers	Some anomalies – mail spike on Saturday
Hours kept in check	Political Mail
Eliminated variation in actual hrs	FSS – Bombed on Tuesday. Need to put more mail in FSS
Good getting Standard Mail in attention	Spiking in volume from Tues to Wed.
Getting carriers back	Heavy flats on Tues – needs tweak between Mon/Tue
Monday is good some OT and workhours	Monday very light
	Very heavy presort on Tuesday
Good attitude of employees	Too light on Monday – Heavy on Tuesday
No OT	Would like to be able to curtail mail
Positive with the employees	Slammed with flats on Tuesday
Good to receive mail in PM	Load leveling is not permanent
Clerks very happy with Monday Flow	
Easier to manager carriers	
Carriers getting off clock earlier	
Mail in PM excellent	

The two week load leveling test period was a success story. Savings was realized during both weeks and all parties (Management and craft) commented repeatedly that the only negative was that the process had to end after two weeks. Shown above are the pluses and deltas from the involved offices. This exercise was conducted during one of our daily telecom that was held to track and monitor performance during the test period. Listed below are some quotes and feedback from offices involved in the test period.

“Tuesdays were busier but no problem. Liked coming to work on Mondays.”

Carrier from Blackwood

“Process worked great. Always fell behind on Mondays and worried about getting the carriers out on time.”

Clerk from Blackwood

"I liked it. I felt it made Mondays manageable and not overwhelming. Tuesday felt like the new Mondays, but not as bad. I like having the workload more even throughout the week."

Carrier from Blackwood

"I Loved it. I really liked the evenness for the rest of the week."

Rural carrier from Blackwood

Feedback from offices during the test period

Blackwood

Yesterday was another successful Monday due to Load Leveling.

DPS was 22% lighter than normal.

Flats were 30% lighter than normal.

1700 = 4 carriers back after 1700, but we had 3.5 open routes.

Today, Tuesday, September 24, 2013:

Significantly higher DPS volume and flats. [name of mailer] was in DPS with IHD from Sept. 24 – 26

65% more DPS today, compared to DPS last Tuesday.

35% heavier presort standard flats today as well.

A late mailing [name of mailer], full coverage set with an IHD of Monday, Sept. 23 came with a green placard for today.

We also received another full coverage mailing – [name of mailer]

Suggestion – Have plant check the IHD's on mailings. We would have rather received the [name of mailer] yesterday and the name of mailer] tomorrow (Wednesday), which would have helped level the load on Monday, Tuesday and Wednesday.

Ocean City

These are our thoughts on the first week of the Load Leveling Pilot Program. Our greatest impact was Monday, We saved hours in F2 on Monday, had less hours of Overtime and no carriers past 1700. The week before on Monday we had 9 past 1700 and 14 hours of OT due to the heavy volume. As of Friday we had (0) carriers past 1700 for the 1st week of the Load Leveling Pilot opposed 17 the previous week. Ocean City experience a great mail flow with no major variation of mail which was very close to the carriers reference volume on the DOIS workload report for each route opposed to the high and low days which would cost us overtime and 1700 issues. Carriers are getting out earlier due to the advancement of mail from the previous night. In F4 it was a great to have mail to be put around at night which improved our morning operation to get all

the mail to the carriers earlier. In Ocean City case, this has been a total success and hope to do better next week.

Voorhees

Getting the less presort standard flats and reasonable amount of DPS on Monday was a huge help in cutting the unnecessary overtime down and getting the carriers back before 17:00. The first Monday of the test was unbelievably lighter than the normal Mondays and the clerks and carriers were very happy to see less standard mail to work. On the other hand the Tuesday volume was higher than the other Tuesdays and kept carriers fully busy. The leveling of the workload between Monday and Tuesday was a big morale booster for the clerks and carriers because the workload was just right on both days. It will boost the customer's satisfaction because they will get their mail delivered by 17:00 on Mondays.

The delivery supervisor also liked the evenly distributed workload between Monday and Tuesday.

Leveled workload on Monday helped in cutting down on the request for help from non OT list carriers. These carriers were happy that they had enough to keep them busy on Tuesday and they did not have to do too much under time on other routes. It cuts down on grievance activity.

Few of our carriers asked today if we can just keep on going with this test. If that's not possible when will the loads leveling actually be implemented.

I am hoping that the results of this test will show that there are huge saving to be realized by implementing the load leveling practices.

Woodbury

The first week was very successful here in Woodbury NJ 08096. I am going to comment about a few things about service commitments:

1. We did not change our start times for our carriers
2. We had no 1800 issues all week
3. Very few 1750 issues all week
4. 77 less 1700 issues all week(147 the week before to 70 this past week)

Overall we used less hours, less overtime, no penalty, maintained the same productivity, had our carriers off the street earlier, and provided better service to our customers.

All of the carriers responses were positive (all wish this would continue)

The biggest success to this story is the volume, no big spikes level through the whole week. This allowed to deliver relatively the same volume us to deliver more parcels and use less hours.

Voorhees PO-Regular hours and overtime hours for delivery operations and city carriers past 1700

Sept 7-13		City Carriers Work Hours						
1700	7-Sep	9-Sep	10-Sep	11-Sep	12-Sep	13-Sep	Total	
	SAT	MON	TUE	WED	THUR	FRI		
Voorhess	181.78	208.80	183.66	184.01	197.08	194.73	1150	

Sept 7-13		City Carriers Overtime Hours						
1700	7-Sep	9-Sep	10-Sep	11-Sep	12-Sep	13-Sep	Total	
	SAT	MON	TUE	WED	THUR	FRI		
Voorhess	25.32	40.8	4.57	13.62	30.47	37.79	153	

Sept 14-20		City Carriers Work Hours						
Test- 1st Wk Var	14-Sep	16-Sep	17-Sep	18-Sep	19-Sep	20-Sep	Total	
	Sat	Mon	Tue	Wed	Thu	Fri		
Voorhess	177.66	192.29	191.83	185.28	192.35	180.32	1120	

Sept 14-20		City Carriers Overtime Hours						
Test- 1st Wk Var	14-Sep	16-Sep	17-Sep	18-Sep	19-Sep	20-Sep	Total	
	Sat	Mon	Tue	Wed	Thu	Fri		
Voorhess	17.77	4.52	5.61	2.13	10.34	12.51	53	

Sept 21-27		City Carriers Work Hours						
Test 2nd Wk Var	21-Sep	23-Sep	24-Sep	25-Sep	26-Sep	27-Sep	Total	
	Sat	Mon	Tue	Wed	Thu	Fri		
Voorhess	177.16	190.84	200.54	188.55	197.51	200.46	1155	

Sept 21-27		City Carriers Overtime Hours						
Test 2nd Wk Var	21-Sep	23-Sep	24-Sep	25-Sep	26-Sep	27-Sep	Total	
	Sat	Mon	Tue	Wed	Thu	Fri		
Voorhess	3.24	4.19	5.69	10.35	21.84	14.84	60	

Sept 7-13		Carriers Returning After 17:00						
1700	7-Sep	9-Sep	10-Sep	11-Sep	12-Sep	13-Sep	Total	
	SAT	MON	TUE	WED	THUR	FRI		
Voorhess	10	13	1	7	12	6	49	

Sept 14-20		Carriers Returning After 17:00						
Test- 1st Wk Var	14-Sep	16-Sep	17-Sep	18-Sep	19-Sep	20-Sep	Total	
	Sat	Mon	Tue	Wed	Thu	Fri		
Voorhess	5	0	2	0	7	2	16	

Sept 21-27		Carriers Returning After 17:00						
Test 2nd Wk Var	21-Sep	23-Sep	24-Sep	25-Sep	26-Sep	27-Sep	Total	
	Sat	Mon	Tue	Wed	Thu	Fri		
Voorhess	0	0	0	6	14	7	27	

Ocean City PO-Regular hours and overtime hours for delivery operations and city carriers past 1700

Sept 7-13		City Carriers Work Hours						
1700	7-Sep	9-Sep	10-Sep	11-Sep	12-Sep	13-Sep	Total	
	SAT	MON	TUE	WED	THUR	FRI		
Ocean City	158	172	157	165	158	158	967	

Sept 7-13		City Carriers Overtime Hours						
1700	7-Sep	9-Sep	10-Sep	11-Sep	12-Sep	13-Sep	Total	
	SAT	MON	TUE	WED	THUR	FRI		
Ocean City	12.98	14.75	0.03	0.81	4.46	16.05	49	

Sept 14-20		City Carriers Work Hours						
Test- 1st Wk Var	14-Sep	16-Sep	17-Sep	18-Sep	19-Sep	20-Sep	Total	
	Sat	Mon	Tue	Wed	Thu	Fri		
Ocean City	153	151.66	161.04	166.57	159.16	151.32	943	

Sept 14-20		City Carriers Overtime Hours						
Test- 1st Wk Var	14-Sep	16-Sep	17-Sep	18-Sep	19-Sep	20-Sep	Total	
	Sat	Mon	Tue	Wed	Thu	Fri		
Ocean City	4.44	2.09	2.13	0.38	7.82	6.17	23	

Sept 21-27		City Carriers Work Hours						
Test 2nd Wk Var	21-Sep	23-Sep	24-Sep	25-Sep	26-Sep	27-Sep	Total	
	Sat	Mon	Tue	Wed	Thu	Fri		
Ocean City	158	151.5	158.21	155.75	158.4	161.08	943	

Sept 21-27		City Carriers Overtime Hours						
Test 2nd Wk Var	21-Sep	23-Sep	24-Sep	25-Sep	26-Sep	27-Sep	Total	
	Sat	Mon	Tue	Wed	Thu	Fri		
Ocean City	4.55	3.1	6.5	7.87	3.41	11.66	37	

Sept 7-13		Carriers Returning After 17:00						
1700	7-Sep	9-Sep	10-Sep	11-Sep	12-Sep	13-Sep	Total	
	SAT	MON	TUE	WED	THUR	FRI		
Ocean City	6	9	0	0	1	1	17	

Sept 14-20		Carriers Returning After 17:00						
Test- 1st Wk Var	14-Sep	16-Sep	17-Sep	18-Sep	19-Sep	20-Sep	Total	
	Sat	Mon	Tue	Wed	Thu	Fri		
Ocean City	0	0	0	0	0	0	0	

Sept 21-27		Carriers Returning After 17:00						
Test 2nd Wk Var	21-Sep	23-Sep	24-Sep	25-Sep	26-Sep	27-Sep	Total	
	Sat	Mon	Tue	Wed	Thu	Fri		
Ocean City	0	0	0	4	0	0	4	

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS ANDERSON
TO PUBLIC REPRESENTATIVE INTERROGATORY**

PR/USPS-T2-4

On page 7 of your testimony, you state “[i]f implemented, the proposed Load Leveling Plan would result in increased productivity and cost savings throughout the South Jersey District.”

- a. Please identify, describe, and provide all documents detailing the Postal Service’s projected productivity gains and costs savings for the South Jersey District if the proposed Load Leveling Plan is implemented.
- b. Please identify, describe, and provide all documents detailing the productivity gains and cost savings that occurred in the South Jersey District during the South Jersey Operations Test.

RESPONSE

a-b. It is anticipated that the productivity gains experienced during the South Jersey Operations Test will recur when the Load Leveling Plan is implemented. As explained in my testimony, productivity is expected to increase as a result of better scheduling, additional equipment availability and more effective mail staging. The Postal Service has not conducted a formal cost savings analysis but as productivity increases and both regular and overtime work hours decrease, the Postal Service expects cost savings will result.