

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

ANNUAL COMPLIANCE REVIEW, 2015

Docket No. ACR2015

RESPONSES OF THE UNITED STATES POSTAL SERVICE TO  
QUESTIONS 1-4 OF CHAIRMAN'S INFORMATION REQUEST NO. 20

The United States Postal Service hereby provides its responses to the above-listed questions of Chairman's Information Request No. 20, issued on March 11, 2016. Each question is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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1. The Postal Service explains that one reason it did not meet the Occupational Safety and Health Administration (OSHA) Illness & Injury frequency rate (OSHA I&I Rate) target is that routes for package delivery, grocery delivery, and Sunday delivery change daily based on need.<sup>1</sup> Consequently, carriers are unable to familiarize themselves with the route and identify associated hazards, leading to more accidents. March 3, 2016, Responses to CHIR No. 17, question 1. In a recent Postal Service Office of Inspector General (OIG) report related to Sunday parcel delivery, Postal Service officials "informed the OIG that they were working on new initiatives to improve street delivery, such as additional delivery time for high-rise apartments, updates to address mapping directions based on corrections, and audio [Dynamic Routing Tool (DRT)] turn-by-turn directions."<sup>2</sup> Does the Postal Service believe that these initiatives have an impact on OSHA I&I Rates?
  - a. If so, what is the current status of these initiatives (including availability of each for Sunday Parcel Delivery Carriers)?
  - b. If not, please explain why.

**RESPONSE:**

The Postal Service expects that some of these initiatives could assist with reducing OSHA I&I accidents (assuming any set amount of deliveries of the type identified in the first sentence of the question). For example, the expected direction of any effect of better map directions based on corrected inputs could only be to reduce accidents, although the magnitude of any such reduction cannot be known. Similarly, as noted, the Postal Service is testing turn-by-turn directions on the MDD. The device currently has visual turn-by-turn directions, and can be equipped to provide audible directions. The audio feature allows the carriers to keep their focus on road conditions and hazard awareness as they travel from delivery point to delivery point. There are 42

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<sup>1</sup> Responses of the United States Postal Service to Questions 1-6 of Chairman's Information Request No. 17, March 3, 2016, question 1 (March 3, 2016, Responses to CHIR No. 17).

<sup>2</sup> United States Postal Service Office of Inspector General, *Sunday Parcel Delivery Service* (Audit Report DR-AR-15-002), December 5, 2014, at 12; available at <https://www.uspsoidg.gov/sites/default/files/document-library-files/2015/dr-ar-15-002.pdf>.

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test sites currently using this feature, and Headquarters Delivery Operations conducts Sunday Bridge Calls to assist delivery with functionality and training. Should tests continue to be successful, completion of a National roll out may be possible by the end of FY 2016.

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2. Please refer to the Accident Type table provided in the March 3, 2016, Responses to CHIR No. 17, question 3a. Nearly all types of accidents—including dog bites, extreme temperatures, distracted driver, and lifting/reaching—increased between FY 2014 and FY 2015 because of the high percentage of employees with less than two years of on-the-job experience. *Id.* question 3b. However, on page 18 of the FY 2015 Annual Report, the Postal Service states that the OSHA I&I Rate decreased primarily due to training and communication efforts focused on new, at-risk employees to address dog bites, extreme heat, distracted driving, and proper lifting and reaching. Please reconcile the decrease in the OSHA I&I Rate with the increase in the number of accidents.

**RESPONSE:**

The OSHA I&I Rate reported in the 2015 Annual Report provided the data as reported to NPA for the year (as of September 30, 2015). These figures represent a snapshot in time and will change after the close out of the year, as the recordability status of claims change or as new claims are filed. The FY 14 NPA reported performance was 6.34, which has now increased to 6.72 due to claim changes received after the close of the NPA reporting period. Running the data on March 13, 2016, results in an OSHA I&I rate for FY 14 of 6.72 and a rate for FY 15 of 6.75. As such, the most current statistics show that the OSHA I&I rate increased between FY 14 and FY 15 by less than one percent. As we stand currently, there was not a decrease in OSHA I&I rate between FY 14 and FY 15, but rather a slight increase.

The accident rates provided in the Postal Service's earlier response reflected the data as of March 3, 2016, and would have been updated since the NPA close out period of FY 15.

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3. In its response to CHIR No. 17, the Postal Service explains that in FY 2016, it will make methodology changes affecting the Delivery Score listed under Customer Insights.<sup>3</sup> It states that the Delivery Score will be expressed as a composite score that includes measurements from a Carrier Survey and P.O. Box Survey. March 9, 2016, Response to CHIR No. 17.
- a. Please provide copies of the Carrier Survey and P.O. Box Survey.
  - b. The FY 2016 target for the Customer Insights composite score is 86.70. FY 2015 Annual Report at 14. Please confirm that this target reflects the changes to the Delivery Score. If not, please explain how the FY 2016 target will be updated to reflect changes to the Delivery Score.
  - c. Does the Postal Service have a FY 2016 target for the Delivery Score? If so, please provide the updated FY 2016 target and supporting workpapers showing how the target was developed.

**RESPONSE:**

Although the response to Question 7 of ChIR No. 17 was accurate when filed on March 9, 2016, shortly thereafter the Postal Service reconsidered and decided not to implement changes to the Delivery survey and the underlying scoring methodology for the remaining part of FY 2016. As of this response, there are no proposed changes that would affect the scoring methodology of the Customer Insights score for fiscal year 2016. Accordingly, the Postal Service will not undertake a separate Carrier Survey or P.O. Box Survey in FY 2016.

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<sup>3</sup> Response of the United States Postal Service to Question 7 of Chairman's Information Request No. 17, March 9, 2016 (March 9, 2016, Response to CHIR No. 17).

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4. In its response to CHIR No. 17, the Postal Service explains that in FY 2016, it will adjust the methodology for the Deliveries per Hour performance indicator. March 9, 2016, Response to CHIR No. 17. The FY 2016 target for this performance indicator score is 42. FY 2015 Annual Report at 14. Will the Postal Service update this target in light of the methodology changes? If so, please provide the updated FY 2016 target and supporting workpapers showing how the new target was developed.

**RESPONSE:**

The FY 2016 target for DPH will not be adjusted for these changes. The indicator this year is being measured as a change from Same Period Last Year (SPLY). The change that was made to take into account the work hours that are earned based on new volume workload in FY 16 is already based on the change in workload from SPLY, so no adjustment is needed. The change to account for Sunday delivery points that are served adjusts both actual and SPLY DPH, and therefore does not impact the percent to SPLY comparison. These two changes to the methodology help the Postal Service to account for the growth items that are unknown in advance and cannot be factored into the target.