

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

PUBLIC INQUIRY ON CHANGES ASSOCIATED
WITH THE DELIVERING FOR AMERICA PLAN

Docket No. PI2023-4

**RESPONSES OF THE UNITED STATES POSTAL SERVICE TO
QUESTIONS 1-8 OF CHAIRMAN'S INFORMATION REQUEST NO. 9**
(May 3, 2024)

The United States Postal Service hereby provides its responses to the above-listed questions of Chairman's Information Request No. 9, issued on April 11, 2024. Order No. 7062 (April 26, 2024) extended the deadline for response to May 3, 2024. Each question is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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May 3, 2024

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1. In the DFA Two-Year Report, the Postal Service states that it “expect[s] to open about 60 [regional processing distribution centers (RPDCs)] across the country.” See DFA Two-Year Report at 16. Please provide a list of the 60 referenced RPDCs, and for each RPDC, please include information requested in subparts 1.a. through 1.f. If the entire list of 60 RPDCs is not available, please provide the information requested in subparts 1.a. through 1.f. for the most up-to-date list of RPDCs.¹
 - a. Current status of each RPDC, *e.g.*, whether it is active, planned, or currently under review in a Mail Processing Facility Review (MPFR).
 - b. Facility physical address including the 5-digit ZIP Code, city, and state.
 - c. Geographical coordinates identifying the location of each facility (longitude and latitude).
 - d. Planned or actual date of activation.
 - e. Facility ID, Finance Number, and name of the existing facility that will be converted into the RPDC, if applicable.
 - f. 3-digit ZIP Codes served.

RESPONSE:

Please see the attachment filed in association with this response in USPS-LR-PI-2023-4-9.

¹ See Library Reference USPS-LR-PI2023-4-NP4, October 23, 2023, Excel file “SDC-RPDC-LPC+Summary+NONPUBLIC.xlsx” (Facilities Excel), tabs “Active Region” and “Potential Action” for example of list to be updated; see *also* Library Reference USPS-LR-PI2023-4-NP1, July 19, 2023, PowerPoint file “RPDC-LPC Summary.pptx” (RPDC-LPC PowerPoint), at 1-3.

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2. The Postal Service states that “[i]t’s anticipated that up to 180 stand-alone [local processing centers (LPCs)] will be opened in the next few years.”² The Postal Service also notes that some LPCs will be co-located with RPDCs. See RPDC-LPC PowerPoint at 0. Please provide a list of the referenced 180 stand-alone LPCs and all co-located LPCs, and for each LPC, please include information requested in subparts 2.a. through 2.g. If the entire list of LPCs is not available, please provide the information requested in subparts 2.a. through 2.g. for the most up-to-date list of LPCs.³
- a. Current status of each LPC, e.g., whether it is active, planned, or currently under review in an MPFR.
 - b. Facility physical address including the 5-digit ZIP Code, city, and state.
 - c. Geographical coordinates identifying the location of each facility (longitude and latitude).
 - d. Planned or actual date of activation.
 - e. Facility ID, Finance Number, and name of the existing facility that will be converted into the LPC, if applicable.
 - f. 3-digit ZIP Codes served.
 - g. Whether the facility is co-located with an RPDC or an S&DC.

RESPONSE:

Please see the attachment filed in association with this response in USPS-LR-PI-2023-4-9.

² See United States Postal Service, *The Eagle Magazine*, Volume 2, Issue 4, July 14, 2023, available at <https://about.usps.com/resources/eaglemag/em20230714.pdf>, at 9 (The Eagle Magazine); see also RPDC-LPC PowerPoint at 0, which approximates the total number of LPCs which are in co-located facilities with RPDCs.

³ See Facilities Excel, tabs “Active Region” and “Potential Action” for example of list to be updated.

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3. The Postal Service states that “[o]ver the next five years, [it] will establish 400 [sorting and delivery centers (S&DCs)] as part of the improved delivery network.”⁴ Please provide a list of the referenced 400 S&DCs, and for each S&DC, please include information requested in subparts 3.a. through 3.g.
- a. Current status of each S&DC, *e.g.*, whether it is active, planned, or currently under review in an MPFR.
 - b. Facility physical address including the 5-digit ZIP Code, city, and state.
 - c. Geographical coordinates identifying the location of each facility (longitude and latitude).
 - d. Planned or actual date of activation.
 - e. Facility ID, Finance Number, and name of the existing facility that will be converted into the LPC, if applicable.
 - f. 5-digit ZIP Codes served.
 - g. Whether the facility is co-located with an LPC.

RESPONSE:

Please see the Excel file associated with this response and attached to this response electronically for a list of currently active S&DCs. As regards subpart a., MPFRs are not conducted for S&DC implementations. As regards subpart g., the status of “co-located with an LPC” means that the carriers identified with the relevant unit will be co-located with an LPC.

⁴ See The Eagle Magazine at 9.

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Because organized labor is only one of several interested stakeholders entitled to notice, and because communications to such stakeholders are subject to differing schedules, the Postal Service considers information about planned changes regarding S&DCs as commercially sensitive as well as predecisional and deliberative, and thereby subject to the deliberative process privilege and other protections. The public version in the attached Excel file therefore excludes such information. Instead, provided under seal in the nonpublic version submitted as part of USPS-LR-PI-2023-4-9, is a list of S&DC facilities in active transition planning for which notifications to the Postal Service's organized labor unions have been delivered pursuant to the applicable collective bargaining agreements.

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4. The Postal Service defines mail flow as the “movement of mail, individually and in containers, throughout the mailstream” and specifies that mail flow is “categorized by four major groups: (a) originating and outgoing mail, (b) Managed Mail Program, (c) sectional center facility (SCF) and incoming primary, and (d) incoming secondary.”⁵
- a. For the redesigned network,⁶ which consists of RPDCs, LPCs, S&DCs, and delivery units (DUs), please explain the set of rules that govern the mail flow for each shape of domestic mail (letters and postcards, flats, and parcels). In the response, please include all factors that make up these rules, including but not limited to the distance between facilities, destination of the mail (whether within same 5-digit ZIP Code, same 3-digit ZIP Code, same RPDC region, or a different RPDC region), availability of mail processing equipment required to process a mail shape at a facility, size of facility, volume of mail, service standard of a mail product, and truck capacity utilization.
 - b. For the redesigned network described in subpart 4.a., please explain the rules that determine to which facility(s) or distribution center(s) mail of each shape will be transported when moved between segments of the mailstream.⁷
 - c. If not specifically addressed in the response to subpart 4.b., please explain how the Postal Service determines whether outgoing mail collected from a Post Office is transported to an S&DC or an LPC (e.g. for consolidation) before its transportation to an RPDC for originating operations.
 - d. If not specifically addressed in the response to subpart 4.b., please explain how the Postal Service determines whether mail is transported directly from an originating RPDC to a destinating RPDC, or any stops are made (e.g., at a surface transfer center, another RPDC, another enroute facility or a hub).
 - e. If not specifically addressed in the response to subpart 4.b., please explain how the Postal Service determines whether destinating parcels

⁵ United States Postal Service Glossary of Postal Terms, available at https://about.usps.com/publications/pub32/pub32_terms.htm.

⁶ See Responses of the United States Postal Service to Questions 1-5 of Chairman's Information Request No. 1, July 19, 2023, question 1.

⁷ These segments include, but are not limited to, (1) Collections from Post Office or Business Mail Entry Unit, (2) Outgoing primary, (3) Outgoing secondary, (4) Managed Mail Program, (5) Sectional center facility, (6) Incoming primary, and (7) Incoming secondary.

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sorted at an RPDC are transported directly to an S&DC or a DU for delivery, or first cross-docked at an LPC.⁸

- f. If not specifically addressed in the response to subpart 4.b., please explain how the Postal Service determines whether destinating mail is transported directly to a DU for delivery or first transported to a transfer hub (such as an S&DC).⁹
- g. If not specifically addressed in the response to subpart 4.b., please explain how the Postal Service determines whether to use air transportation or surface transportation for a segment of travel.
- h. Please describe any exceptions to the rules discussed in subparts 4.a. through 4.g., for any products within each mail shape, including any scenarios that might require different rules.

RESPONSE:

The representations below concern the design of the future-state network. As noted in response to ChIR 7, Question 1 in the instant docket, the intended functions for each new facility category within the redesigned network are planned around an embedded system and infrastructure that must continue to operate; as a result, these intended functions may be subject to varying adjustments and configurations as the need arises and subject to our systematic and deliberative processes.

a-c. Please see the response to ChIR 7, Question 1 in the instant docket. That response describes the operations to be performed at RPDCs, LPCs, S&DCs and DUs in the redesigned network. Below, the same information is reorganized, with few additions, into outgoing and destinating mail flows. "Originating mail flows," as here

⁸ See Notice of United States Postal Service of Supplemental Response to Question 4 of Chairman's Information Request No. 4, October 26, 2023, (Supplemental Response to CHIR No. 4), which notes that 5-digit parcels may be cross-docked at LPCs.

⁹ See Supplemental Response to CHIR No. 4; see *also* United States Postal Service's Motion for Reconsideration of Chairman's Information Request No. 7, January 2, 2024, at 18, which states that all S&DCs will act as transfer hubs.

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conceptualized, correspond roughly to the first half of a mail piece's end-to-end trajectory, from collection to sortation at an originating RPDC. "Destinating mail flows," as here conceptualized, correspond roughly to the second half of that mail piece's end-to-end trajectory, from sortation at a destinating RPDC to dispatch toward its destinating address.

Originating flows

Originating DUs: Delivery units will be associated (or "hubbed") with either an S&DC or an LPC, meaning that trucks dispatched from S&DCs or LPCs will collect mail of all shapes, as well as parcels, from Delivery Units. Delivery units in close proximity to an RPDC may dispatch directly to that RPDC. Note that some LPCs will be co-located with RPDCs, and that as a result, mail and parcels collected at DUs with which such LPCs are hubbed will be transported to a facility with the same physical address as an RPDC.

Originating LPCs and S&DCs: Outgoing mail collected at DUs will be deposited at either the LPC or an S&DC that services its destinating mail and packages. The LPC or S&DC will separate letters, postcards and flats from parcels. Once separated, mail and parcels will then be transferred to an RPDC.

Originating RPDCs: These processing hubs are intended to serve as control points, or nodes, for a region, managing the flow of mail and packages from that region. As such, they will handle originating operations for letters, postcards, flats and parcels. Note that RPDCs to which DUs dispatch directly will separate letters, postcards and flats.

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Destinating flows

Destinating RPDCs: RPDCs are intended to handle destinating operations for letter trays, flat tubs, and packages for a designated region. Broadly speaking, RPDCs will sort destinating volume for all letters, flats, and packages to the 3-digit level. RPDCs will cross-dock 3-digit letters and flats to an LPC, after performing a tray or bundle sort if needed. RPDCs will sort destinating parcels at the 3-digit level destined for the LPCs. Note that as part of this sortation methodology, and as a function of volume and other considerations (such as space constraints at LPCs and/or S&DCs), some parcels will be pulled out of the 3-digit sort and finalized at the 5-digit level in the following circumstances:

- 5-digits are “jackpotted”—that is to say, combined within the same bin, albeit with the 5-digit level groupings preserved, destined for 5-digit sortation at an S&DC;
- 5-digits are cross-docked by an LPC or S&DC to the DU;
- 5-digits are directly dispatched to the DU.

Destinating LPCs: LPCs will sort destinating letters, flats, and sort and/or cross-dock packages to S&DCs and DUs at the 5-digit level. LPCs may also sort and/or cross-dock carrier route bundles of flats to S&DCs and DUs. Please note that, for DUs where LPCs are the servicing transfer hub, packages will be sorted and/or cross-docked at LPCs, departing from there for the DUs; and that, for DUs where S&DCs are the servicing transfer hub, LPCs will transport mail volume to the servicing S&DCs to be combined with package volume and dispatched to DUs.

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Destinating S&DCs: S&DCs will sort packages to the carrier route level, sort manual 5-digit letters and flats to the carrier route level, and carriers will sort manual letters and flats to delivery point sequence. From S&DCs, carrier volume will be dispatched for delivery. For DUs where S&DCs are the servicing transfer hub, S&DCs will sort and/or cross-dock packages to the 5-digit and will combine with cross-docked 5-digit letter and flats, to be dispatched to DUs.

Destinating DUs: DUs will sort packages to the carrier route level, sort manual 5-digit letters and flats to the carrier route level, and carriers will sort manual letters and flats to delivery point sequence. From DUs, volume is (and will be) dispatched for delivery.

d. In the redesigned future-state network, the intent is to transport mail and packages in an integrated manner by utilizing RPDCs (as opposed to other facilities, such as STCs) as network nodes to consolidate volume. RPDCs will serve as gateways for their respective regions as well as intermediate hubs. The Postal Service makes modeling and routing decisions based on considerations of truck utilization and service responsiveness.

e. As explained above, this determination will be made as a function of volume (e.g., high-volume delivery units), distance (e.g., proximity to S&DC) and LPC capacity constraints (e.g., space limitations).

f. RPDCs will always transport destinating mail through an LPC to be sorted before such mail is transported to an S&DC or DU. As for how the Postal Service determines

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whether such mail is transported directly to a DU for delivery or is first transported to an S&DC, please see the explanation, under subparts a-c above, of destinating LPCs.

g. The Postal Service reviews both capability and costs for servicing an origin to destination pair by surface or air transportation. Air transportation is selected when we are unable to service the pair timely on surface transportation or would otherwise require additional surface transportation at a higher cost. Where surface transportation is feasible to support the service standard of the product, the estimated cost of servicing the volume on the air network is compared to the estimated cost of adding the surface transportation, and the lowest-cost solution is selected.

h. As explained above and in response to ChIR 7, question 1 in the instant docket, the planned functions for each new facility category within the redesigned network, are designed around an embedded system and infrastructure that must continue to operate and may be subject to varying adjustments and configurations as the need arises. Thus, while the response to ChIR 7 question 1 in the instant docket, and the response to subpart a. above, describe the intended design functionality of RPDCs, LPCs, S&DCs, and DUs within the redesigned network, site-specific space and machine capacity constraints may compel different combinations of facilities and processing functions (such that, for example, some sortation functions that would ideally be assigned to S&DCs are instead assigned to nearby RPDCs or LPCs).

The process described in subpart g. above describes how the Postal Service determines whether to use air transportation or surface transportation for a segment of

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travel. No rules provide exceptions to this process, though deviations may arise on a case-by-case basis.

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5. The Postal Service states in a number of MPFR initial findings¹⁰ that the business case supports transferring mail processing outgoing operations because most of the volume is destined for outside of the originating area. For each originating mail processing facility currently operational in the Postal Service network please provide information requested in sub-parts 5.a. through 5.d.
- a. Facility physical address including the 5-digit ZIP Code, city, and state.
 - b. Facility ID and Finance Number.
 - c. Geographical coordinates identifying the location of a facility (longitude and latitude).
 - d. For each mail shape, the corresponding destinating mail processing or distribution facilities, and information requested in i. through iii.
 - i. Facility physical address of each destinating facilities including the 5-digit ZIP Code, city, and state.
 - ii. Geographical coordinates identifying the location of each destinating facility (longitude and latitude).
 - iii. Total mail volume (by shape) transferred to each next destinating facility for further processing or distribution in FY 2023.

RESPONSE:

a-c. Please see the Excel file associated with these subparts of the response in the zip file attached to this response set electronically. However, the public version in the attached zip file excludes the commercially sensitive geographical coordinates requested in subpart c., which are instead provided under seal in the nonpublic version submitted as part of USPS-LR-PI-2023-4-9.

d.i-ii. Originating mail from the processing facilities identified in response to subparts a-c above may flow to any of the processing or distribution facilities in the Postal Service

¹⁰ USPS Mail Processing Facility Reviews, Charleston, SC, "initial-findings-charleston-sc-03-01-24.rft;" Champaign, IL, "initial-findings-champaign-il-03-04-24.rft;" Burlington, VT, "initial-findings-burlington-vt-03-04-24.rft;" Casper, WY, "initial-findings-casper-wy-02-14-24.rft," available at <https://about.usps.com/what/strategic-plans/mpfr/welcome.htm>.

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network. These facilities were identified, and the physical addresses and the geographical coordinates of these facilities were provided, in response to ChIR No. 7 in the instant docket.

iii. The Postal Service does not have an accurate or reliable way of estimating volumes of specific mail shapes transferred to each next destinating facility for further processing or distribution in FY 2023.

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6. The Postal Service states in the Final MPFR for Medford, OR, that Medford, OR processing and distribution center (P&DC) is removing two Advanced Facer Canceler System 200 (AFCS 200) machines after moving originating operations to Portland, OR RPDC and that the Medford, OR P&DC will be modernized as a Local Processing Center.¹¹
- a. Please confirm that after removing two AFCS 200 machines from Medford, OR P&DC, all letter mail cancelling previously completed at Medford, OR P&DC will occur at the Portland OR RPDC. If not confirmed, please explain.
 - b. If subpart 6.a. is confirmed, please also confirm that letter mail cancelling will occur only at RPDCs (as part of the redesigned network). If not confirmed, please explain.
 - c. Please confirm that for all mail shapes, the first processing scan, or “start-the-clock” events for products for which the processing duration begins from “start-the-clock,”¹² will occur at RPDCs. If not confirmed, please explain.
 - d. Please describe, for each mail shape or groups of mail products, how moving originating operations to an RPDC may affect the duration of the first mile (between start-the-clock of the first mile and first processing scan at the RPDC) and the processing duration.

RESPONSE:

- a. Confirmed.
- b. In general, in the redesigned network, mechanized cancellations will occur at RPDCs. As noted in response to Question 4 above, however, site-specific space and machine capacity constraints may compel combinations of facilities and processing functions that deviate from this design (such that, for example, some processing functions normally assigned to RPDCs are instead assigned to nearby LPCs).

¹¹ USPS Mail Processing Facility Reviews, PDF file “medford-or-workbook.pdf,” available at <https://about.usps.com/what/strategic-plans/mpfr/welcome.htm>.

¹² See Docket No PI2022-3, Library Reference USPS-LR-PI2022-3/2, May 20, 2022, PDF file “iSPM RevPlan - Red Lined 5-19-22.pdf.”

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Please note that the above remarks apply to mechanized cancellations. Manual cancellations will continue to be available at retail units.

c. Not confirmed. Origin entered mail start-the-clock events will occur at the RPDC. Destination entered mail start-the-clock events may occur at other processing facilities. In the example of Medford, Oregon, cited in the preamble to this question, destination entered mail start-the-clock events will occur at the RPDC or at the Medford LPC, as applicable.

d. The Postal Service does not anticipate that moving originating operations to an RPDC will affect the duration of the first mile (between start-the-clock of the first mile and first processing scan at the RPDC) and the processing duration.

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7. Please confirm the service performance scores for “First-Class Mail Single-Piece Letters/Postcards Two-Day” in the Georgia district¹³ between March 9, 2024 and March 15, 2024, as provided in the following table:¹⁴

	Performance	Performance Plus 1	Average Days to Delivery
Inbound Mail Only	18.29%	31.6%	5.5
Outbound Mail Only	12.32%	27.4%	5.8
Origin to Destination (to and from same ZIP Code)	11.25%	24.89%	5.9

- a. If confirmed, please explain all the factors that have contributed to the poor performance in the Georgia district.
- b. If confirmed, please describe measures, if any, the Postal Service will take to prevent similar issues with mail-in ballots during this election year.
- c. If not confirmed, please explain why the information in the service performance dashboard has been incorrect.

RESPONSE:

Confirmed, and while we acknowledge that we still have a long way to go for service to be provided at the levels that the Postal Service and our customers expect, each of the service performance metrics in the chart has steadily improved every week for all periods that have been reported on the service performance dashboard since the week of March 9th that is the focus of this request.

¹³ A sample of ZIP Codes were used to confirm service performance was constant across the Georgia district, including the following ZIP Codes: 30343, 30084, 30388, 30010, 30011, and 30023.

¹⁴ USPS Service Performance Dashboard, available at <https://about.usps.com/what/performance/service-performance/external-service-measurement.htm>.

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a. As an initial matter, it should be emphasized that the Atlanta region has long underperformed when compared to the rest of the nation; indeed, since FY 2016, this region's market dominant performance has consistently scored in the bottom 50th percentile and has in most years scored in the bottom 25th percentile. Service performance had also been trending down prior to the recent network changes. This historically poor performance is due, in large part, to a poorly designed, poorly maintained transportation and facilities network: one in which the processing of originating and destinating volume was dispersed haphazardly across multiple sites, and excessive trips increased expenses, imposed environmental costs, and created opportunity for error and delay.

It is also important to note that, in its initial phases, the transformation of the Atlanta region occurred without disruption. The transfer of originating package processing operations to the Atlanta RPDC began in November 2023, a move which helped support a successful 2023 peak holiday season. Freight was routed to and from the Atlanta RPDC prior to peak season as well, and in January 2024 a terminal handling operation was insourced. To reiterate, these measures were implemented without serious disruption.

However, as with most large-scale rollouts of new technology and processes, the inauguration of the Atlanta RPDC impacted service, particularly in late February 2024, when employees and volumes were moved. The challenges confronting the Atlanta network activation include:

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- **Workforce Challenges:** Employee moves are constrained by contractual agreements limiting employee moves to four particular dates a year. As a result, and despite pre-activation activities and mitigation efforts, several critical activities had to occur specifically on the February 24, 2024, activation date. Notably, a thousand employees were repositioned to the Atlanta RPDC in a single day; and this occurred in tandem with the movement of package processing into the new facility, the activation of a new operating plan, and an update of all transportation routes to match the new volume and operating profiles. Compounding these issues, the Postal Service encountered shortages in employee availability.
- **Staging Space and Sequencing at RPDC:** Truckload traffic in and out of the facility grew congested as deviations in arrival and departure times accumulated, creating periods of significant backlog in trailer loading and unloading cycle.
- **Execution at Subsidiary Facilities:** Outside of the RPDC, there have been challenges at local processing plants that send and receive product to the RPDC, with inbound and outbound volume not being processed timely. This reflects long-standing operational failures that, historically, were masked by investments of inordinate labor hours to counteract network deficiencies.
- **Supervisory Competency:** The Atlanta RPDC activation revealed a long-standing management competency gap, with many managers and supervisors providing insufficient supervision and accountability. The Postal Service is

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addressing this issue with more active training, guidance, and other means of reinforcement.

- **Contractor Failures:** In the midst of the RPDC rollout, the contractor operating the Atlanta area Surface Transfer Center unexpectedly declared bankruptcy. Atlanta is a key logistics gateway to the Southeast, with the Surface Transfer Center handling nearly 500 truck trips per day. The product handled by this vendor needed to be rapidly insourced, over a compressed period of weeks (rather than months, as would ordinarily be the expected timeframe for such an insourcing if it took place in the normal course of business).

The Postal Service is working actively to address the challenges, including by:

- Ongoing operational meetings that are held 7 days a week, twice daily, to drive improvements in the region.
- Weekly, cross-functional, executive-level meetings to understand and address the causes of service degradation.
- Revising transportation schedules to better align the RPDC with other local processing plants.
- Establishing a traffic flow to manage down truck congestion and backlog.
- Increasing local trips as necessary to improve service.
- Dedicating additional staff of executives and experienced operational leaders.
- Adding additional processing capacity to LPCs.
- Retreating employees from RPDC to LPCs to support employee availability at LPCs (specifically, at the Atlanta and Duluth LPCs).

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- Shifting cross-country volume away from the RPDC as appropriate until service stabilizes.

b. The Postal Service continues to prioritize and monitor the timely delivery of Election Mail. As in previous election years, we are deploying our longstanding policies and procedures, including use of our “all clear” and “daily log” process, advancing Election Mail, and trying to ensure that every return ballot mailed by voters receives a postmark.

The Postal Service will also use “extraordinary measures” beyond our normal course of operations when appropriate to accelerate ballots in the days immediately leading up to and following the general election. These measures often bypass or accelerate typical processing operations.

More information can be found at: [Election Mail - about.usps.com](https://about.usps.com/election-mail)

c. N/A

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8. Please see Attachment, filed under seal.