



Office of Inspector General | United States Postal Service

Audit Report

Delivery Delays - Richmond District

Report Number DR-AR-19-005 | April 12, 2019



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Highlights

Objective

Our objective was to evaluate mail delivery delays in selected delivery units in the Richmond District.

Strong consumer demand for goods purchased over the Internet has driven growth in the package industry despite otherwise declining mail volume. This growing package segment provides the U. S. Postal Service an opportunity to expand services and increase revenue.

With this growth, city carriers and non-career city carrier assistants (CCA) are delivering more packages and fewer letters to more addresses each year. To accommodate these changes, the Postal Service must adapt to this changing mail mix while maintaining service and efficiency. Meeting these expectations is key to maintaining customer confidence in the Postal Service.

The Postal Service's goal is for 95 percent of city carriers to return from street operations before 5 p.m., and 100 percent by 6:00 p.m. By achieving this goal, the Postal Service can meet its 24-hour operational requirement to collect, distribute, and deliver mail on time.

This audit responds to concerns raised about mail service in selected post offices in the Richmond District. Customers complained their mail was not delivered, tampered with, damaged, and mis-delivered. The Richmond District has 74 delivery units, 1,415 city routes in the Delivery Operations Information System, and 1,064,670 city delivery points. Our analysis of key city delivery performance indicators including carriers returning after 7 p.m., overtime hours used, and customer complaints identified 16 delivery units with poor performance.

What the OIG Found

Mail was not always delivered timely in the 16 selected delivery units.

Our analysis of city delivery operations and customer service data in these 16 units identified:

- None of the 16 units achieved their goal of distributing mail to carrier routes after arrival from the processing center by 8:30 a.m., known as the Distribution-Up-Time (DUT), during September 2018.
- Over 18 percent of the city carriers returned to their units after 7 p.m. and as late as 10 p.m. in fiscal year (FY) 2018.
- Fifteen of 16 units (94 percent) did not properly manage arrow lock keys (used to secure and service mail receptacles), which are accountable items.
- None of the 16 units adequately addressed Enterprise Customer Care (eCC) customer complaints. In FY 2018, the selected delivery units re-opened 811 of 16,243 resolved eCC cases. Further, 4,453 of 16,385 cases were not resolved within the Postal Service's established timeframes of 1-3 days.

These conditions occurred because:

- Supervisors did not always use available tools to report operational and mail flow issues impacting city delivery.
- Supervisors at 11 of 16 units were not effectively communicating daily expectations to carriers to meet performance standards.
- Supervisors did not always use the Regional Intelligent Mail Server (RIMS) and the Delivery Management System (DMS) to monitor carrier route performance during street delivery.
- Carriers were not returning arrow lock keys at the end of the day, supervisors and clerks were unaware of the arrow lock key security policies, and carriers did not always sign for arrow lock keys.
- Management did not follow the customer complaint resolution policy.

As a result, we estimated the Richmond District incurred \$1.7 million annually in questioned costs for unauthorized overtime and penalty overtime. Furthermore,

“ The Richmond District incurred \$1.7 million annually in questioned costs for unauthorized overtime and penalty overtime. Furthermore, the district incurred questioned costs \$83,899 annually for the processing of re-opened customer complaints.”

the district incurred questioned costs \$83,899 annually for the processing of re-opened customer complaints.

What the OIG Recommended

We recommended management:

- Direct supervisors to communicate expectations to carriers and utilize operational and reporting tools to monitor delivery operations.

- Direct delivery unit management to follow policies and procedures to ensure the security and accountability of arrow lock keys.
- Direct supervisors to follow customer service policies and procedures to maintain a customer complaint log and resolve customer complaints timely and with customer satisfaction.

Transmittal Letter



OFFICE OF INSPECTOR GENERAL
UNITED STATES POSTAL SERVICE

April 12, 2019

MEMORANDUM FOR: JANICE L. ATHERLY, DISTRICT MANAGER,
RICHMOND DISTRICT

Janet Sorensen 

FROM: Janet M. Sorensen
Deputy Assistant Inspector General
for Retail, Delivery, & Marketing

SUBJECT: Audit Report – Delivery Delays – Richmond District
(Report Number DR-AR-19-005)

This report presents the results of our audit of the Delivery Delays – Richmond District (Project Number 18RG014DR000).

We appreciate the cooperation and courtesies provided by your staff. If you have any questions or need additional information, please contact Rita F. Oliver, Director, Delivery & Retail Operations, or me at 703-248-2100.

Attachment

cc: Corporate Audit Response Management
Postmaster General

These conditions occurred because unit supervisors did not always report operational and mail flow problems including late arriving mail, impacting city delivery in the CSDRS and DOIS.⁷ Per Postal Service policy,⁸ supervisors and managers are responsible for managing office operations, such as mail distribution, to meet daily operational performance and service standards, to ensure an even flow of mail is provided to the carriers.

Carriers Returning Late

City carriers and CCAs in the Richmond District did not meet the goal of 100 percent of carriers returning to the office by 6 p.m. Our analysis identified that in FY 2018, 18.47 percent of the city carriers returned to their units after 7 p.m. and as late as 10 p.m. (see Table 2). For example, at the [REDACTED], we identified 107 instances of city carriers delivering mail as late as 10 p.m. in FY 2018 (see Appendix B).

Table 2. FY 2018 City Carriers and CCAs Returning Between 6 p.m. and 10 p.m. at Selected Units

	Carriers Returning by 6 p.m.	Carriers Returning by 7 p.m.	Carriers Returning by 8 p.m.	Carriers Returning by 9 p.m.	Carriers Returning by 10 p.m.
Percent	52.10%	81.53%	94.57%	98.56%	99.68%

Source: OIG analysis of Enterprise Data Warehouse (EDW)-Delivery Data Mart.

These conditions occurred due to ineffective supervision and oversight of city delivery office and street operations. Specifically, we found:

- Supervisors at 11 of 16 units were not effectively communicating daily expectations to carriers to meet performance standards. Postal Service policy⁹ states that supervisors are required to discuss expectations with each carrier every day. Also, if a carrier is not meeting performance standards, a supervisor must investigate and discuss deficiencies with that carrier. All

delivery service managers should develop and maintain delivery units at a high degree of efficiency and assure Postal Service standards are preserved.

- Supervisors did not always use the Regional Intelligent Mail Server (RIMS), Delivery Management System (DMS), or DOIS tools to monitor carrier route performance during street delivery. The Postal Service established DMS and RIMS to provide visibility on packages, vehicles, routes, and actual deliveries in real-time. This information also includes real-time data for the current day activities or historical data of each month for review. According to Postal Service policy,¹⁰ supervisors are required to use DMS, RIMS, and DOIS, to manage street delivery operations.
- Supervisors were not reviewing and approving OT requests on Postal Service (PS) Form 3996, *Carrier Auxiliary Control*, before carriers left the office to begin street delivery. In addition, PS Form 3999, *Inspection of Letter Carrier Route*, is one of the tools management uses to supervise street delivery and shows the route base mail volume, which allows the supervisor to know a carrier’s exact Line of Travel, manage route times, the modes of delivery used and where a carrier should be and at what time.

Recommendation #1

We recommend the Manager, Richmond District, direct supervisors to communicate expectations to carriers and utilize operational and reporting tools to monitor delivery operations.

Finding #2: Missing Arrow Lock Keys

Fifteen of 16 units (94 percent) did not properly manage arrow lock keys, which are accountable items used to secure and service mail receptacles. Specifically, we noted that arrow lock keys were missing in 13 units based on the daily log inspections. Also, 13 units had arrow lock keys in inventory that did not match the daily logs, 15 units had an ineffective key distribution process, and 12 units did not maintain the master inventory key log (see Table 3).

⁷ DOIS was designed to provide actionable data to the delivery unit supervisors, assisting them in managing the office activities, planning of street activities, and managing the route inspection and adjustment activities.
⁸ Handbook M-39, Management of Delivery Services TL-13, 03-01-98 updated with Postal Bulletin revisions through March 18, 2004.
⁹ Handbook M-39, Management of Delivery Services, Section 111.1, March 1998 – updated March 2004.
¹⁰ Delivery Standard Operating Procedure (SOP), Tab 4, City Delivery Standard Operating Procedures Street Management Section, FY 2006.

The Postal Inspection Service provides security guidelines to protect the mail from theft during collection and delivery. Insufficient oversight and supervision of accountable items such as the arrow lock key will put mail at risk for someone to steal cash and checks, packages, and to obtain personal information that can be used to commit identity theft.

“13 units had arrow lock keys in inventory that did not match the daily logs.”

Table 3. Arrow Lock Key Observations

Delivery Units	Keys Matched the Log	Key Distribution Process Ineffective	Keys Missing Based on Log Inspection	Master Inventory Maintained
██████	■	■	■	■
██████	■	■	■	■
██████████	■	■	■	■
██████	■	■	■	■
██████	■	■	■	■
██████	■	■	■	■
██████	■	■	■	■
██████	■	■	■	■
██████████	■	■	■	■
██████	■	■	■	■
██████	■	■	■	■
██████	■	■	■	■

Delivery Units	Keys Matched the Log	Key Distribution Process Ineffective	Keys Missing Based on Log Inspection	Master Inventory Maintained
██████	■	■	■	■
██████	■	■	■	■
██████	■	■	■	■
██████████	■	■	■	■
██████	■	■	■	■

Source: OIG analysis of site observations.

These conditions occurred because:

- Carriers were not returning arrow keys at the end of day after they completed mail delivery.
- A night time clerk was not always assigned to account for the arrow keys in the evening when carriers returned from street delivery.

- Master key logs were not maintained because arrow key security guidelines/policies requiring the log had not been communicated to delivery unit clerks or supervisors.
- Carriers obtained the keys from the accountable cart without signing. At one delivery unit, we observed carriers not required to sign for arrow keys, instead they just wrote the route number and left for street delivery.

Postal Service policy¹¹ states the Delivery Service Manager must ensure the accountable items are properly handled. Additionally, when carriers return from their routes, clerks are available to check in accountable items as efficiently and promptly as possible.¹²

Postal Service policy¹³ further states if a clearance employee is not available, arrow lock keys (and any other Postal Service keys in temporary use, such as for vehicles) should be deposited in a secure location, for instance, a designated storage box.

Because of our findings regarding the lack of arrow lock key security during our initial four site visits, district management issued instructions on September 21, 2018 to all facilities regarding safety and accountability of the arrow lock keys. In a subsequent meeting on November 8, 2018, we informed the District Manager that we noted arrow lock keys were not being secured and policies were not being followed at the remaining 12 units.

Recommendation #2

We recommend the Manager, Richmond District, direct the delivery unit management to follow Postal Service policies/procedures to ensure the security and accountability of arrow lock keys, which could include posting instructions for returning keys and maintaining key logs as required.

“Units did not adequately address customer complaints at the 16 selected delivery units.”

Finding #3: Customer Complaints Not Resolved Timely

Units did not adequately address customer complaints at the 16 selected delivery units and had 811 of 16,243¹⁴ resolved eCC cases re-opened¹⁵ (see Table 4).

Table 4. FY 2018 Total eCC Delivery Complaints and Re-Opened Cases

Delivery Units	Where is My Package	Where is My Mail	Re-Opened Cases
██████████	643	259	0
██████████	398	213	50
██████████	1,104	623	71
██████████	231	84	27
██████████	861	387	102
██████████	275	102	21
██████████	893	422	97
██████████	598	220	33
██████████	203	81	17
██████████	576	204	48
██████████	1,878	569	142

¹¹ Postal Operations Manual, POM Issue 9, 633.42 Arrow Lock Keys.

¹² Handbook M-39, Accountable Property Criteria, Sections 111.2, Daily Operations, Accountable Property, 127 Office Work When Carriers Return.

¹³ Arrow/Mail Key Accountability Guide, August 2017.

¹⁴ The 16,243 are the total resolved cases for the 16 selected units and 811 of these resolved cases were re-opened.

¹⁵ A case is re-opened when a customer is not satisfied with the resolution to their case and the re-opened date is within 90 days of the original resolution date.

¹⁶ Includes ██████████.

Delivery Units	Where is My Package	Where is My Mail	Re-Opened Cases
██████	518	225	63
██████	345	223	11
██████	485	226	44
██████	238	85	36
██████	775	356	49
Total	10,021	4,279	811

Source: Postal Service ASR (CCC/RPM) database.

Further, 4,453 of 16,385 cases were not resolved within the Postal Service's established timeframe of 1-3 days (see Table 5). The Postal Service's goal is to have 90 percent of its cases resolved within these timeframes, known as the Service Level Agreement ¹⁷(SLA).

Table 5. FY 2018 eCC Customer Complaints and Service Level Agreement Data

Delivery Units	Resolved	Within SLA	Outside SLA	Percentage of Complaints Resolved Within SLA
██████	1,043	908	135	87.10%
██████	740	485	255	65.50%
██████	1,929	908	1,021	47.10%
██████	355	266	89	74.90%
██████	1,460	1,018	442	69.70%
██████	433	403	30	93.10%

¹⁷ The Postal Service uses the number of resolved cases to calculate the percentage of cases resolved within the SLA agreement.

¹⁸ Two units (██████) had limited duty personnel assigned to resolve the customer complaints.

¹⁹ Postal Service's Complaint Handling Guidelines for Residential and Small Business Customers, dated July 2015.

Delivery Units	Resolved	Within SLA	Outside SLA	Percentage of Complaints Resolved Within SLA
██████████	1,533	1,177	356	76.80%
██████	899	815	84	90.70%
██████	346	264	82	76.30%
██████	904	563	341	62.30%
██████	2,787	1,576	1,211	56.55%
██████	837	737	100	88.10%
██████	635	625	10	98.40%
██████	816	703	113	86.20%
██████	368	316	52	85.90%
██████	1,300	1,168	132	89.80%
Total	16,385	11,932	4,453	72.82%

Source: Postal Service ASR (CCC/RPM) database.

This occurred because management did not follow the Postal Service complaint resolution policy. We identified the selected 13 of 16 units had supervisors¹⁸ assigned to review, manage, or resolve customer complaints within the requirement of 24 hours first contact and resolution within 72 hours, as required. However, due to other responsibilities, the supervisors were not able to resolve the customer complaints timely. Additionally, none of the 16 units we visited maintained a customer complaint log enabling them to follow-up on customer complaints received at the retail window.

Postal Service policy¹⁹ sets forth the appropriate method for handling customer complaints through the eCC process. The local post office is required to assign responsibility for checking eCC three times a day; contact customers within

24 hours to acknowledge the issue and proceed with resolution. In addition, for those customers who issue a complaint by phone or through a walk-in, the complaint is required to be logged in a Customer Complaint Control Log.

The Postal Service's ability to collect, process, and resolve customer complaints is key to retaining customers and increasing revenue. Proper management and timely complaint resolution is vital to the eCC resolution process. A prompt response to customer complaints and the ability to handle customer concerns, issues, and complaints in a timely and professional manner will improve the customer contact experience.

As a result of re-opened customer complaints, the Richmond District incurred questioned costs of \$167,799 in FYs 2017 and 2018. Proper management and timely resolution of eCC complaints could result in a cost avoidance of \$167,799 in FYs 2019 and 2020.

Recommendation #3

We recommend the Manager, Richmond District, direct supervisors to follow customer service policies and procedures to maintain a customer complaint log and resolve customer complaints timely and with customer satisfaction.

Management's Comments

Management disagreed with finding 1, but agreed with findings 2 and 3 of our report. Additionally, management disagreed with recommendations 1, 3 and the monetary impact and agreed with recommendation 2.

In response to recommendation 1, management disagreed and stated that the process of communicating expectations and using operational and reporting tools already exists. Additionally, management stated that this recommendation is vague, subjective and non-quantifiable. The district communicates daily with supervisors on addressing delivery expectations.

In response to recommendation 2, management reissued standard work instructions on March 20, 2019 for security and accountability of arrow keys.

In response to recommendation 3, management stated it was vague and does not allow for quantifiable closure. Management stated the Richmond District is committed to providing high quality service to the customers and will reissue the standard work instructions to supervisors on addressing and resolving customer complaints. Management did not provide a date for reissuance.

Management disagrees with the \$3,649,486 in questioned costs, and \$3,649,486 in funds put to better use stating that having a late Distribution-Up-Time does not necessarily correlate to additional costs. Management stated that data used to identify this as unauthorized OT is typically an administrative oversight where hours were not coded properly. Additionally, management stated that the OIG attributed all unauthorized OT to failure to follow the processes when management was aware of the time used and had approved locally. The Distribution-Up-Time of 8:30 a.m. is a goal as well as delivery after 1800 does not necessarily mean that delivery is late.

See [Appendix C](#) for management's comments in their entirety.

Evaluation of Management's Comments

The OIG considers management's comments responsive to recommendations 2 and 3 and non-responsive to recommendation 1. The corrective actions for recommendation 2 and 3 should resolve the issues identified in the report.

Regarding management's disagreement with recommendation 1, management stated the process of communicating expectations and using operational and report tools already exist and the recommendation is vague, subjective and non-quantifiable. While these processes are in place, supervisors were not communicating expectations to carriers and were not using the operational and reporting tools to monitor delivery operations during our audit. Postal Service policy states that supervisors are required to discuss expectations with each carrier every day. Also, if a carrier is not meeting performance standards, a supervisor must investigate and discuss deficiencies with that carrier. All delivery service managers should develop and maintain delivery units at a high degree of efficiency and assure Postal Service standards are preserved. We consider management's comments unresponsive and view the disagreement as unresolved until we coordinate a resolution with management.

Regarding recommendation 3, although management stated they disagreed, the corrective actions outlined address the intent of the recommendation and are therefore responsive.

Regarding management's disagreement with the monetary impact, the OIG's analysis did not question all OT, but instead only questioned POT and Unauthorized OT occurring on routes. These two categories of labor compounded with our understanding of how this OT was incurred, provides a direct example of how improper management of these selected delivery units led to excessive costs incurred by the Postal Service regardless of the budget. Additionally, Postal Service policy states the Postal Service (PS) Form 3996, *Carrier Auxiliary Control* is used to request OT or auxiliary assistance. During our site visits, we

found supervisors were not always reviewing and approving OT requests on PS Form 3996 before carriers left the office to begin street delivery. Regarding the portion of the monetary impact associated with re-opened customer complaints, proper management and timely resolution of eCC complaints could result in avoidance of additional cost. As such, we believe our calculations accurately reflect the monetary impact outlined in the report.

All recommendations require OIG concurrence before closure. The OIG requests written confirmation when corrective actions are completed. All 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.

Appendices

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Appendix A: Additional Information

Scope and Methodology

Our objective was to evaluate mail delivery delays in selected delivery units in the Richmond District. To accomplish our objective, we:

- Reviewed applicable laws, regulations, policies, and procedures related to mail delivery.
- Judgmentally selected 16 delivery units in the Richmond District based on their city delivery performance indicators which included carriers returning after 7 p.m., OT and POT for city carriers and city carriers assistants, and customer complaints for FY 2018.
- Obtained and analyzed FYs 2017 and 2018 customer complaints from the eCC system. Specifically, identified complaint frequency data in the Richmond District, identified stations with the highest number of complaints related to inaccurate and untimely mail delivery.
- Conducted interviews with station management to gain understanding of reasons for delivery delays issues and their process to resolve customer complaints regarding delayed and inadequate delivery services. Additionally, conducted interviews with Richmond District management regarding delayed mail issues.

- Interviewed management to understand their daily use of the CSDRS and the Mail Condition Reporting System to improve mail delivery operations and resolve mail arrival issues from the mail processing facilities.

We conducted this performance audit from August 2018 through April 2019 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 March 5, 2019 and included their comments where appropriate.

We relied on data obtained from Postal Service Operational systems, including EDW, eFlash, SPMS, and Customer Remarks in eCC system. We assessed the reliability of data by confirming our results with management, interviewing agency officials knowledgeable about the data and conducting limited data testing and determined that the data were sufficiently reliable for this report.

Prior Audit Coverage

There were three audits conducted in the last two years that directly relate to this objective.

Report Title	Objective	Report Number	Final Report Date	Monetary Impact
<i>Delivery Delays-Atlanta District</i>	To evaluate mail delivery delays in selected delivery units in the Atlanta District.	DR-AR-18-007	07/03/2018	\$11,175,903
<i>City Carriers Returning After 6 P.M-South Florida District</i>	To evaluate city carriers returning to the office after 6 p.m. in the South Florida District.	DR-AR-18-006	07/03/2018	\$116,297,744
<i>City Carriers Returning After 6 P.M-Bay Valley District</i>	To evaluate city carriers returning to the office at 6 p.m. in the Bay Valley District.	DR-AR-17-007	08/30/2017	\$92,060,142

Appendix C: Management's Comments



April 2, 2019

LAZERICK POLAND
DIRECTOR, AUDIT OPERATIONS

SUBJECT: Response to Draft Audit Report – Delivery Delays- Richmond District (Report Number DR-AR-19-DRAFT)

Thank you for the opportunity to respond to the Office of Inspector General (OIG) draft audit report, "Delivery Delays- Richmond District". Management disagrees with one finding and agrees with two findings noted in the audit report. Management does not agree with 2 of the recommendations and agrees with one of the recommendations as outlined in the audit per the responses below.

Regarding the monetary impacts identified as questioned costs of \$3,649,486.00 and as Funds Put to Better Use of \$3,649,486.00, we disagree as having a late distribution uptime does not necessarily correlate to additional costs. The data used to identify this as unauthorized overtime is typically an administrative oversight where hours were not coded properly. The OIG attributed all unauthorized overtime to failure to follow these processes when in reality management was aware of the time used and had approved locally. The Distribution Uptime of 8:30 AM is a goal as well as delivery after 1800 does not necessarily mean that delivery is late.

Recommendation #1

We recommend the Manager, Richmond District, direct supervisors to communicate expectations to carriers and utilize operational and reporting tools to monitor delivery operations.

Management Response/Action Plan

Richmond District disagrees with this recommendation due to the fact that the process of communicating expectations and using operational and reporting tools already exists. Additionally, this recommendation is vague, subjective and virtually non-quantifiable. The District communicates daily with supervisors on addressing delivery expectations.

Recommendation #2

We recommend the Manager, Richmond District, direct the delivery unit management to follow Postal Service policies/procedures to ensure the security and accountability of arrow lock keys, which could include posting instructions for returning keys and maintaining key logs as required.

Management Response/Action Plan

Management agrees with this recommendation. The district does have standard work instructions for the security and accountability of arrow keys. However, this audit uncovered instances of units that were not in compliance. We have since reissued standard work instructions on March 20, 2019 for security and accountability of Arrow keys.

Recommendation #3

We recommend the Manager, Richmond District, direct supervisors to follow customer service policies and procedures to maintain a customer complaint log and resolve customer complaints timely and with customer satisfaction.

Management Response/Action Plan

Richmond District disagrees with this recommendation due to the fact that it is vague and does not allow for a quantifiable closure of the recommendation. The Richmond District is committed to providing high quality service to our customers. The District will reissue the standard work instructions with supervisors on addressing and resolving customer complaints.


Janice Atherly, District Manager, Richmond District

cc: Manager, Corporate Audit & Response Management



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