# Efficiency of Surface Transfer Centers in the Western Pacific Region



# Table of Contents

Cover	
Highlights	1
Background	1
What We Did	1
What We Found	1
Recommendations	1
Transmittal Letter	2
Results	3
Introduction/Objective	3
Background	3
Finding #1: Surface Transfer Center Performance	4
KPI Performance	4
PS Form 6166	5
Recommendation #1	6
Recommendation #2	6
Recommendation #3	6
Finding #2: Surface Transfer Center Contracts	6
Recommendation #4	7
Management's Comments	7
Evaluation of Management's Comments	
Appendices	9
Appendix A: Additional Information	10
Scope and Methodology	10
Prior Audit Coverage	
Appendix B: Management's Comments	11
Contact Information	14

# **Highlights**

### **Background**

Surface Transfer Centers are facilities where mail and packages are received in containers for consolidation and staging to be loaded and transported to other facilities. These transfer centers also serve as a concentration point to consolidate mail volume and reduce the number of trips needed to transport mail. They are strategically located in a geographical region with the greatest opportunity to provide service to two – and three-day delivery areas. The transfer centers are operated by contract employees with management oversight by U.S. Postal Service officials.

### What We Did

Our objective was to evaluate the efficiency and effectiveness of the Surface Transfer Centers in the Western Pacific Region. To accomplish our objective, we reviewed key performance indicators associated with the transfer centers and conducted site visits at the transfer centers in Southern California, Northern California, and Salt Lake City.

### What We Found

The Postal Service has an opportunity to improve the efficiency and effectiveness of monitoring supplier performance at the transfer centers in the Western Pacific Region. Specifically, Postal Service officials were not consistently monitoring the suppliers' performance and key performance indicators were missing in the Surface Transfer Center Report Card, which is used to monitor supplier performance. Additionally, Postal Service officials were not issuing and submitting corrective action forms to the suppliers and Postal Service headquarters management when the supplier did not meet performance targets. As a result, the supplier was not taking corrective action to bring performance into compliance with the contract and the Postal Service did not collect about \$245,633 in penalties annually for missed performance targets. Furthermore, the Salt Lake City transfer center did not have key performance indicators in its contract. When the Postal Service does not include performance metrics in its contracts, suppliers cannot be held accountable and assessed penalties when they do not meet performance targets.

### Recommendations

We recommended management (1) implement weekly performance reviews of the suppliers' performance and assess penalties when performance targets are not met; (2) add all contractual Key Performance Indicators to the Surface Transfer Center Report Card; (3) submit corrective action forms to the supplier and headquarters management when performance targets are not met; and (4) include Key Performance Indicators in Surface Transfer Center contracts that are renewed or awarded to suppliers.



# Transmittal Letter



July 13, 2023

MEMORANDUM FOR: ROBERT CINTRON

VICE PRESIDENT, LOGISTICS

PETER ROUTSOLIAS

VICE PRESIDENT, TRANSPORTATION STRATEGY

FROM: Mary Lloyd

Deputy Assistant Inspector General

for Mission Operations

Mary K. Sloyd

**SUBJECT:** Audit Report – Efficiency of Surface Transfer Centers in the Western

Pacific Region (Report Number 23-031-R23)

This report presents the results of our audit of Surface Transfer Centers in the Western Pacific Region.

We appreciate the cooperation and courtesies provided by your staff. If you have any questions or need additional information, please contact Brandi Adder, Acting Director, Transportation, or me at 703-248-2100.

Attachment

cc: Postmaster General

Corporate Audit Response Management

Chief Logistics Officer

## Results

### Introduction/Objective

This report presents the results of our self-initiated audit of the Efficiency of Surface Transfer Centers (STC) in the Western Pacific Region (WestPac) (Project Number 23-031). Our objective was to evaluate the efficiency and effectiveness of the STCs in the WestPac Region. See Appendix A for additional information about this audit.

### **Background**

STCs are facilities where mail and packages are received in containers for consolidation and cross-docking<sup>1</sup> to destination facilities. STCs also serve as a concentration point to consolidate mail volume and reduce the number of trips needed to transport mail. STCs are strategically located in a geographical region with the greatest opportunity to provide service to two- and three-day delivery areas.

The U.S. Postal Service has 13 STCs in its transportation network. Each STC has specific operating standards, reporting requirements, and performance metrics against which they are measured. We evaluated the three STCs in the WestPac Region: Northern California (NoCal), Southern California (SoCal), and Salt Lake City (SLC) (see Figure 1).

STCs are operated by a supplier with management oversight provided by local Postal Service officials. The NoCal and SoCal STC contracts were awarded in July 2021, however, the STCs were not fully operational until November 2021. The NoCal and SoCal STC contracts contain Key Performance Indicators (KPI) for assessing supplier efficiency and compliance with core STC functions. The KPIs represent the minimum threshold for satisfactory contract performance. Suppliers are held to performance that meets or exceeds the listed performance targets (see Table 1).

Figure 1. WestPac Region STCs



Source: U.S. Postal Service Office of Inspector General (OIG) analysis of Surface Visibility.

<sup>1</sup> A dock transfer that entails transporting mail that has not and will not be processed in the facility. Mail or equipment may be transported directly between two vehicles, between a vehicle and a staging area, or between two staging areas. The staging areas may be on the platform or inside the facility.

Table 1. KPIs for NoCal and SoCal STCs

KPI	Definitions	Performance Targets
Trailer Scan Performance	Percentage of arrival and departure scans performed on inbound and outbound transportation	98%
Inbound Container Scan Performance	Percentage of containers expecting unload scans being performed	95%
Outbound Container Scan Performance	Percentage of containers expecting load scans being performed	95%
Other Container Scan Performance	Percentage of assign, close, terminate, consolidate scans performed	95%
Truck Unload Cycle Time	Average cycle time from begin unload to final unload of trips	20 minutes
Transportation Cycle Time	Average cycle time from truck arrival to final unload	30 minutes
Outbound Trips On-time	Percentage of on-time outbound trips **Removing HCR failures	95%
Processing Cycle Time	Average cycle time of container unload to end processing on mechanized equipment	90 minutes
Mail Meeting 1-hour Transfer Time	Percentage of total cross-dock mail connecting to outbound transportation within one hour of scheduled arrival or one hour of actual arrival if truck arrives late	98%
Defect Rate	Percentage of total containers scanned onto the incorrect outbound trip	1%

Source: NoCal and SoCal STC contracts, dated July 13, 2021.

Postal Service Contracting Officer's Representatives or their designees are required to track the KPIs weekly and review the target performance with the suppliers each week. If the Contracting Officer's Representatives or their designees identify KPIs that miss the weekly target, the suppliers are charged a penalty for each week that they fail to meet or exceed the KPI target. These penalties are submitted for payment at the end of each month.

Additionally, failure to meet or exceed the KPI target is considered noncompliance and regarded as an irregularity. When irregularities occur, the local Postal Service official at the STC is required to issue a Postal Service (PS) Form 6166, STC Contractual Noncompliance, to the supplier. Once issued, the supplier is required to respond within 14 calendar days of receipt and is responsible for promptly taking corrective action to bring performance into compliance.

The Postal Service manages and monitors the same KPIs for all suppliers at the STCs using the STC Report Card and other surface transportation dashboards in Surface Visibility<sup>2</sup> and Informed Visibility<sup>3</sup>. The report card allows Postal Service officials to evaluate STC performance on a daily and weekly basis.

# Finding #1: Surface Transfer Center Performance

We found the Postal Service has an opportunity to improve the efficiency and effectiveness of performance monitoring at the STCs in the WestPac Region. Specifically, Postal Service officials were not consistently monitoring the suppliers' performance and KPIs were missing in the STC Report Card. Additionally, Postal Service officials at the STCs were not issuing PS Form 6166 to the suppliers or submitting them to headquarters management when irregularities occurred.

### **KPI Performance**

Postal Service management at the NoCal and SoCal STCs stated they were monitoring the suppliers' performance and found the suppliers were meeting performance targets. However, we reviewed weekly performance at the NoCal and SoCal STCs from November 6, 2021, through December 30, 2022 (a total of 60 weeks) and found suppliers did not always meet the performance targets. See Table 2 for analysis on which KPI weekly targets were missed from November 6, 2021, through December 30, 2022.

<sup>2</sup> A system that provides the Postal Service with real-time data and reporting on the movement and delays of trucks delivering mail via Highway Contract Routes.

<sup>3</sup> A near real-time, single source for all domestic-bound mail and mail aggregate tracking information.

Table 2. KPI Weekly Targets Missed

	NoCal STC		SoCal STC		Total
KPIs	Number of Weeks Target Missed	Percent of Time Target Missed	Number of Weeks Target Missed	Percent of Time Target Missed	Number of Weeks
Trailer Scan Performance	1	1.7%	0	0.0%	60
Inbound Container Scan Performance	0	0.0%	0	0.0%	60
Outbound Container Scan Performance	1	1.7%	3	5.0%	60
Other Container Scan Performance	6	10.0%	6	10.0%	60
Truck Unload Cycle Time <sup>4</sup>	8	13.3%	6	10.0%	60
Transportation Cycle Time	11	18.3%	5	8.3%	60
Outbound Trips On-time	60	100.0%	60	100.0%	60

Source: OIG analysis of Surface Visibility.

This occurred because local Postal Service officials were not consistently using the STC Report Card and other surface transportation dashboards to monitor supplier performance. For example, neither the NoCal nor SoCal STCs met the Outbound Trips On-Time target from November 6, 2021, through December 30, 2022. In addition, Postal Service officials stated three of the 10 contractual KPIs (Defect Rate, Mail Meeting 1-Hr Transfer Time, and Process Cycle Time) were not in the STC Report Card or readily available in other surface transportation dashboards. As a result, no penalties were assessed to the suppliers for missing weekly KPI targets. We determined the Postal Service incurred Questioned Costs<sup>5</sup> in the amount of \$281,973 for not assessing penalties when weekly targets were missed from November 6, 2021, through December 30, 2022.

### **PS Form 6166**

Postal Service officials at the NoCal and SoCal STCs were not consistently issuing PS Form 6166 when weekly KPI targets were not met. The Postal Service requires 100 percent contract compliance and when the supplier does not meet performance targets, Postal Service policy states that officials should issue PS Form 6166. We reviewed PS Forms 6166 and found:

 NoCal STC officials issued 32 PS Forms 6166 from November 10, 2021, through July 18, 2022, but none were issued for KPI targets being missed.  SoCal STC officials issued 73 PS Forms 6166 from January 2, 2022, through January 25, 2023, but only eight (11 percent) were issued for KPI targets being missed.

At the NoCal and SoCal STCs, Postal Service officials were issuing PS Form 6166 for other issues like a broken scanner, failure to dispatch mail, or straps not being used to tie down the mail. However, Postal Service officials were not always issuing PS Forms 6166 when the supplier did not meet the weekly KPI targets because they were not consistently monitoring the suppliers' performance. When the Postal Service does not require its suppliers to take corrective actions, there is less visibility of the movement of mail through the STC and the mail could be at risk of not meeting service commitments.

Additionally, headquarters management had no visibility into the suppliers' performance at the NoCal and SoCal STCs. This occurred because local Postal Service officials store PS Forms 6166 locally and are not required to submit the forms to headquarters management. As a result, headquarters management is unable to confirm that KPIs are monitored, and penalties are assessed when suppliers miss weekly targets. Furthermore, without visibility into how many PS Forms 6166 have been issued to a supplier, Postal Service management is at risk of renewing a suppliers' contract without having key information to make informed decisions.

<sup>4</sup> While this KPI is not in the STC Report Card, there is a report with weekly historical data that can be found in another surface transportation dashboard (Informed Visibility).

<sup>5</sup> A subset of questioned costs that are called into question because of missing or incomplete documentation, or because of failure to follow required procedures.

### **Recommendation #1**

We recommend the **Vice President, Logistics**, implement weekly reviews of the Key Performance Indicators and assess penalties when contractual performance targets are not met.

### **Recommendation #2**

We recommend the **Vice President, Logistics**, add all contractual Key Performance Indicators to the Surface Transfer Center Report Card.

### **Recommendation #3**

We recommend the **Vice President, Logistics**, require local Surface Transfer Center officials to submit Postal Service Form 6166 to the supplier and to headquarters management for increased visibility and decision making when performance targets are not met.

# Finding #2: Surface Transfer Center Contracts

We found the Postal Service does not have a standardized contract for the STCs. We reviewed all STCs and found KPIs are a requirement at six of the 13 (46 percent) STCs (see Table 3).

Table 3. STC Contract Information

STC	Contract Start Date	Contract End Date	KPIs
Atlanta, GA	7/8/21	7/7/26	Yes
Brandywine, MD	7/8/21	7/7/26	Yes
Northern California	7/8/21	7/7/26	Yes
Southern California	7/8/21	7/7/26	Yes
New England	7/8/21	7/7/26	Yes
Northern NJ (Newark)	7/8/21	7/7/26	Yes
Kansas City, MO	8/1/19	9/30/23	No
Chicago, IL	3/30/20	3/29/25	No
Salt Lake City, UT	10/1/18	9/30/23	No
Dallas, TX	10/1/18	9/30/23	No
Memphis, TN	10/1/18	9/30/23	No
Indianapolis, IN	10/1/18	9/30/23	No
Seminole	10/20/20	10/19/25	No

Source: Contract Authoring Management System.

In the WestPac region, the contracts for the NoCal and SoCal STCs includes the 10 KPIs but the SLC STC does not have KPIs in the contract. The STC Report Card and surface transportation dashboards in Surface Visibility and Informed Visibility allow Postal Service officials to monitor performance for the SLC STC. However, penalties cannot be assessed because the SLC STC supplier is not contractually obligated to adhere to the KPIs. We analyzed SLC STC performance from October 2, 2021, through December 30, 2022, and identified several weeks where KPI targets were missed. For example, the SLC STC did not meet the Outbound Trips On-Time KPI target for all 65 weeks (see Table 4).

Table 4: KPI Weekly Targets Missed at the SLC STC

KPIs	Number of Weeks Target Missed	Percent of Time Target Missed	Total Number of Weeks
Trailer Scan Performance	6	9.2%	65
Inbound Container Scan Performance	3	4.6%	65
Outbound Container Scan Performance	6	9.2%	65
Other Container Scan Performance	7	10.8%	65
Truck Unload Cycle Time	33	50.8%	65
Transportation Cycle Time	18	27.7%	65
Outbound Trips On-time	65	100.0%	65

Source: OIG analysis of Surface Visibility.

Postal Service management stated the SLC STC does not have KPIs because the contract could not be modified during the contract term since the renegotiation would be more complicated than a normal modification. However, management stated that future contractual awards and renewals would include the KPIs.

When the Postal Service does not include KPIs in STC contracts, penalties cannot be assessed when suppliers do not meet performance targets. If there were KPIs in the SLC STC contract, the Postal Service could have collected \$292,226 in penalties from October 2, 2021, through December 30, 2022.

### **Recommendation #4**

We recommend the **Vice President, Transportation Strategy**, in coordination with the **Vice President, Logistics**, include Key Performance Indicators in future Surface Transfer Center contracts that are renewed or awarded to suppliers.

### **Management's Comments**

Management agreed with finding 2, and recommendations 1 and 4; did not fully agree with finding 1; and disagreed with recommendations 2 and 3, and the monetary impact calculation. See Appendix B for management's comments in their entirety.

Regarding finding 1, management stated that postal managers are consistently monitoring performance through daily huddles and weekly meetings and are issuing PS Forms 6166 for non-compliance of KPIs.

Regarding the monetary impact, management disagreed with the calculation of monetary savings and stated that the weeks provided by the OIG where KPIs were not met, do not match what the Postal Service has recorded.

Regarding recommendation 1, management stated the STCs have weekly meetings to review KPIs. In addition, they will issue PS Forms 6166 and assess penalties where applicable. The target implementation date is August 30, 2023.

Regarding recommendation 2, management stated that the STC Report Card includes seven of the 10 KPIs and the other three KPIs (*Defect Rate, Mail Meeting 1-Hr Transfer Time,* and *Process Cycle Time*) are assessed using various postal dashboards and resources.

Regarding recommendation 3, management stated that PS Forms 6166 are issued to the supplier and logged at a site level and that headquarters has full access to all PS Forms 6166 on file.

Regarding recommendation 4, management stated that all newly implemented STCs and future STC contracts will include KPIs. The target implementation date is August 30, 2023.

### **Evaluation of Management's Comments**

The OIG considers management's comments responsive to recommendations 1 and 4 and corrective actions should resolve the issues identified in the report. We consider management's comments nonresponsive to recommendations 2 and 3 and

will pursue concurrence through the formal audit resolution process.

Regarding finding 1, we reported that not all KPIs were monitored consistently because three of the 10 contractual KPIs (Defect Rate, Mail Meeting 1-Hr Transfer Time, and Process Cycle Time) were not in the STC Report Card or readily available in other surface transportation dashboards. We also reported that Postal Service officials were not always issuing PS Forms 6166 when the supplier did not meet the weekly KPI targets. Of the 32 PS Forms 6166 issued by NoCal STC officials, zero were issued for KPI targets being missed. Similarly, only eight of the 73 PS Forms 6166 issued by the SoCal STC were for KPI non-compliance. Based on Postal Service data there should have been PS Forms 6166s issued for one of the KPIs (Outbound Trips-on-Time) that the STCs missed for each of the 60 weeks we reviewed.

Regarding the monetary impact, we reviewed the missed KPIs and applied the contractual rates for each missed target that the Postal Service could have assessed penalties. The Postal Service stated that the weeks used by the OIG where KPIs were not met do not match what the Postal Service has recorded; however, the Postal Service did not provide data supporting their analysis.

Regarding recommendation 2, while we agree that the STC Report Card includes seven of the 10 KPIs, we disagree that they can assess the remaining three KPIs using various dashboards and resources. As mentioned in the report, the three KPIs (Defect Rate, Mail Meeting 1-Hr Transfer Time, and Process Cycle Time) are not readily available in other surface transportation dashboards. Postal Service employees could not demonstrate how to pull historical information for the three missing KPIs from the Report Card and headquarters was unable to provide the service performance for those three KPIs.

Regarding recommendation 3, while we agree that PS Forms 6166 are logged locally, we disagree with their statement that headquarters has full access to all PS Forms 6166s on file or that PS Form 6166s are being issued to the supplier. As previously stated, the SoCal STC only issued eight PS Forms 6166 for KPI non-compliance. Based on Postal Service data, there should have been PS Forms 6166 issued for the Outbound Trips-on-Time KPI that the STC missed for each of the 60 weeks we reviewed. Additionally, while PS Forms 6166s are logged locally, local Postal Service

officials are not required to submit the forms to headquarters management for visibility.

All recommendations require OIG concurrence before closure. Consequently, the OIG requests written confirmation when corrective actions are completed. 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** Appendix A: Additional Information......10 Scope and Methodology ......10 Prior Audit Coverage ......10 Appendix B: Management's Comments ......11

# Appendix A: Additional Information

### **Scope and Methodology**

We evaluated the performance of the STCs in the WestPac Region from October 2, 2021, through December 30, 2022. To accomplish our objective, we:

- Conducted interviews with headquarters management and Contracting Officer Representatives to determine how STC performance was being monitored.
- Completed site visits in January 2023 at the NoCal, SoCal, and SLC STCs and determined STC efficiency by evaluating the suppliers' performance. Also, reviewed PS Forms 6166 issued by Postal Service officials.
- Reviewed all STC contracts to determine differences between the contracts within each region.
- Analyzed KPI performance data for October 2, 2021, through December 30, 2022, for each STC in the WestPac Region.
- Determined if the Postal Service is recouping penalties when the supplier does not meet

performance targets. Also, calculated how much in penalties the Postal Service could have recouped.

We conducted this performance audit from January 2023 through July 2023 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 June 8, 2023, and included their comments where appropriate.

We assessed the reliability of any computergenerated data used for the purpose of this report. Specifically, we assessed the reliability of Surface Visibility. We determined that the data was sufficiently reliable for the purposes of this report.

### **Prior Audit Coverage**

Report Title	Objective	Report Number	Final Report Date	Monetary Impact
Efficiency of Surface Transfer Centers in the Southern Region	To evaluate the efficiency and effectiveness of the Southern region's STCs.	21-212-R22	03/16/2022	\$4,768,151

# Appendix B: Management's Comments



June 30, 2023

JOHN CIHOTA DIRECTOR, AUDIT SERVICES

SUBJECT: Management Response - Efficiency of Surface Transfer Centers in the Western Pacific Region Report Number 23-031-DRAFT

Thank you for providing the Postal Service with an opportunity to review and comment on the findings and recommendations contained in the draft audit report, *Efficiency of Surface Transfer Centers in the Western Pacific Region*.

Finding #1: Surface Transfer Center Performance We found the Postal Service has an opportunity to improve the efficiency and effectiveness of performance monitoring at the STCs in the WestPac Region. Specifically, Postal Service officials were not consistently monitoring the suppliers' performance and KPIs were missing in the STC Report Card. Additionally, Postal Service officials at the STCs were not issuing PS Form 6166 to the suppliers or submitting them to headquarters management when irregularities occurred.

Response: Postal managers are consistently monitoring performance through daily huddles and weekly meetings. The STCs issue 6166s for non-compliance of KPIs

Finding #2: Surface Transfer Center Contracts We found the Postal Service does not have a standardized contract for the STCs. We reviewed all STCs and found KPIs are a requirement at six of the 13 (46 percent) STCs

Response: Postal agrees and future contracts will be standardized and include KPIs

In regard to monetary penalties, the Postal service disagrees with calculations. Weeks provided by OIG where KPIs were not met, do not match what postal has recorded.

Following are our comments on each of the four recommendations.

### Recommendation [1]:

We recommend the **Vice President, Logistics**, implement weekly reviews of the Key Performance Indicators and assess penalties when contractual performance targets are not met.

### Management Response/Action Plan:

Management **agrees** with this recommendation. The STCs already have in place weekly meeting to review KPIs. We will issue 6166s and assess penalties were applicable.

### Target Implementation Date:

8/30/23

### Responsible Official:

Director STC Operations

### Recommendation [2]:

We recommend the **Vice President**, **Logistics**, add all contractual Key Performance Indicators to the Surface Transfer Center Report Card.

### Management Response/Action Plan:

Management **disagrees** with this recommendation. The Report card includes 7 of the 10 KPIs. The other 3 KPIs are assessed using various postal dashboards and resources.

### **Target Implementation Date:**

N/A

### Responsible Official:

N/A

### Recommendation [3]:

We recommend the **Vice President, Logistics**, require local Surface Transfer Center officials to submit Postal Service Form 6166 to the supplier and to Headquarters management for increased visibility and decision making when performance targets are not met.

### Management Response/Action Plan:

Management **disagrees** with this recommendation. 6166s are issued to the supplier and logged at a site level. Headquarters has full access to all 6166s on file.

### **Target Implementation Date:**

N/A

### Responsible Official:

N/A

### Recommendation [4]:

We recommend the **Vice President, Transportation** Strategy, in coordination with the **Vice President, Logistics**, include Key Performance Indicators in future Surface Transfer Center contracts that are renewed or awarded to suppliers.

### Management Response/Action Plan:

Management **agrees** with this recommendation. All newly implemented STCs have KPIs in the contracts and future STC contracts will include KPIs

### **Target Implementation Date:**

8/30/23

### Responsible Official:

STC Director of Transportation/VP Transportation Strategy

Robert Cintron Digitally signed by Robert Cintron Date: 2023.07.05 21:16:27 -04'00'

Robert Cintron VP, Logistics

cc: CARMManager@usps.gov





Contact us via our Hotline and FOIA forms. Follow us on social networks. Stay informed.

1735 North Lynn Street, Arlington, VA 22209-2020 (703) 248-2100

For media inquiries, please email press@uspsoig.gov or call (703) 248-2100