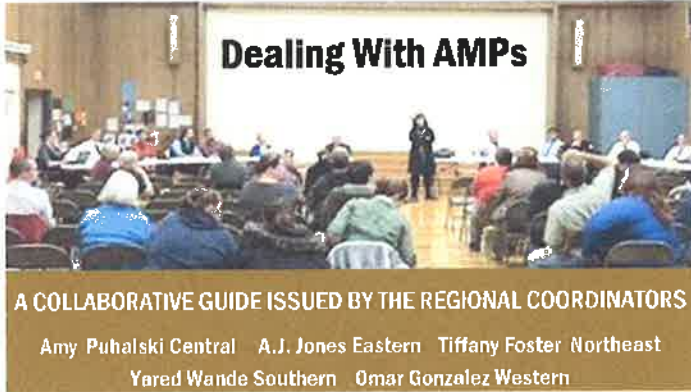


Dealing With DFA

DELAYING FAULTY
AMPS





PMG DeJoy's misnomer the *Delivering For America* plan is in full blown bloom. USPS has announced the start of consolidating facilities with mail processing operations. This move follows the consolidations of multiple delivery units throughout the regions resulting in employee and mail service impacts. This guide is provided for Locals as a tool to help handle the issues.

Background

Area Mail Processing (AMP) is not a new consolidation process. USPS guidelines go back to 1979. The PO 408 was revised in 2008. In 2011 management began implementing area mail processing "studying" hundreds of processing plants and facilities for possible consolidation.


In 2014 the Mail Handler's Division of LIUNA and APWU challenged management's consolidation of 82 mail processing facilities citing violations of the PO 408 mostly on the basis of using outdated data. The appeals reached arbitration in 2015.

APWU supported the Mail handler's position that the PO 408 is an Article 19 Handbook. USPS argued the 408 was not a handbook directly related to wages, hours or working conditions. Management also claimed that the Unions could challenge the impact of consolidations under Article 12.

The arbitrator's analysis referenced the applicability of the Postal Accountability and Enhancement Act (PAEA) and declared that the employees and their Unions have a vital interest in the conduct of AMP studies... and the impact of AMP studies on their hours, wages and working conditions.

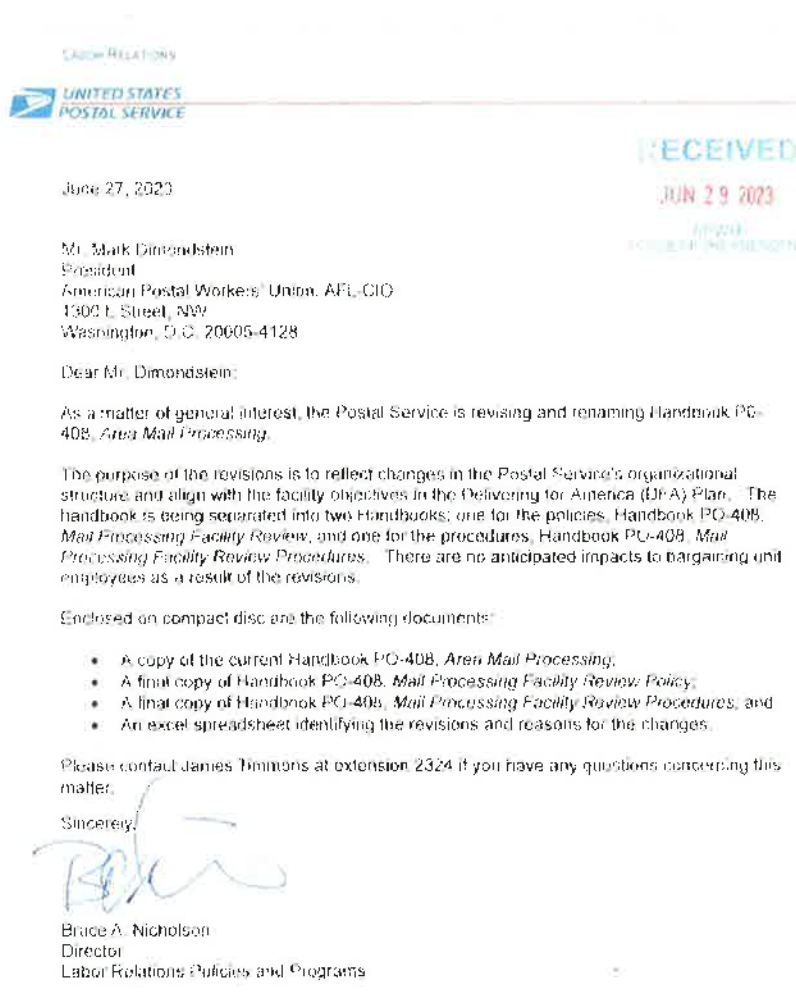
The arbitrator expressed that the purpose of the 408 is not just to provide guidance to managers on how to do an AMP study nor is it just an internal document. The 408 includes ensuring the interests of postal employees, **as well as, other stakeholders**, are adequately considered. It is not just providing notice/communication and stakeholder input, but a more broader process in part mandated by law.

In a final effort to prevail management tried to use an NALC case against APWU & LIUNA. However, the Unions were not a part of the NALC case and therefore that arbitration award was not binding.

NATIONAL ARBITRATION PANEL	
In the Matter of the Arbitration between UNITED STATES POSTAL SERVICE and NATIONAL POSTAL MAIL HANDLERS UNION, AFL-CIO and AMERICAN POSTAL WORKERS UNION, AFL-CIO - INTERVIEWER	Case No. Q11M60-C 14903130 Interim Award (Threshold Issue)
BEFORE: Shyam Das	
APPEARANCES:	
For the Postal Service:	Judith W. Bramocco, Esq.
For the NPMHU:	Steve R. Lerner, Esq.
For the APWU:	Melinda K. Holmes, Esq.
Place of Hearing:	Washington, D.C.
Date of Hearing:	April 9, 2015
Date of Award:	December 3, 2015
Relevant Contract Provisions:	Article 15
Contract Year:	2011 - 2016
Type of Grievance:	Contract Interpretation
Interim Award Summary:	
Article 19 incorporates Handbook PO 408 into the National Agreement. The parties should proceed to schedule a hearing on the merits of the grievance.	
 Shyam Das, Arbitrator	

In August 2022 APWU was advised by Management that the Postal Service had decided to end all 57 open AMPs. The USPS Director of Contract Administration also advised that USPS was going forward with the Delivering For America Plan including strategies to develop a mail processing network that enables more precise, efficient and reliable service by using "best-in-class logistics practices".

Management claimed that the plan establishes a new operating model that dramatically improves on-time delivery performance. As part of the plan USPS will re-assess the role of ALL processing facilities. They also claimed that they would adhere to all legal, statutory, contractual and regulatory requirements in the development of their network design.



On July 10, 2023 the Regional Coordinators were informed by APWU HQ that management had notified the National in late June of the revision and renaming of Handbook PO 408, *Area Mail Processing*.

The claimed purpose of the revisions was to reflect the USPS changes to its organizational structure and to be aligned to the objectives of DeJoy's Delivering for America (DFA) Plan.

In effect management separated the 408 into two handbooks 1. for policies and 2. one for procedures. Management then claimed that there are no anticipated impacts to bargaining unit employees because of the revisions.

What management did not inform the Union is that the revisions became effective in December 2022 but revealed to the Union 6 months later.

Current Concerns and Issues

On August 1, 2023 the National met with the Regions to review the modified AMP procedures and to discuss the role of the union at community town hall meetings.

It was agreed that "Talking Points" would be provided to the Regions to disseminate to the Locals on these AMPs and the expected community meetings.

On August 25th the Regions were notified by National that AMP studies would be conducted in Augusta and Macon GA, as well as, Eugene and Medford OR. A request for talking points was again made and the issue was placed on the NEB agenda meeting for September. The National notified the Regions on AMPs in Pennsylvania, Florida, Missouri, Delaware, Washington, Indiana, Texas and Tennessee. Yet, another request was made to the National for the talking points.

National HQ's Talking Points

Some Talking Points for Community Meetings Regarding Mail Processing Changes

- Moving locally-generated mail destined for the local area over long distances to be sorted and processed will slow down service.
- The PMG claims that his reorganization of the Network will speed up the mail. These proposed changes to mail processing will do the opposite.
- These slowdowns will especially affect local government, small businesses, local media, and civic organizations-institutions most reliant on the mail and for whom the Postal Service was designed to support.
- Changes to where the mail is processed will also delay mail destined for Post Office boxes. This will have a particularly negative impact on the small business community who count on the mail being processed into the P.O. Boxes early in the day.
- Locally-generated mail being mailed to the local area should be held out and sorted in the local processing facilities.
- USPS management is planning to have destination mail sorted in what they are calling Local Processing and Delivery Centers. There is no point in shipping and sorting local mail (sometimes hundred of miles away) to then be returned to be locally processed for delivery in the local area.
- The people rely on the USPS to meet critical needs from medicines and ballots to checks and financial services. The Postal Reorganization Act of 1970 guarantees "prompt and reliable" services. The proposed mail processing moves run counter to the law.

From the Office of the Executive VP

Identify Your Objective, Your Plan, and Your Budget for Your Local Consolidation Fightback

As a Union Leader you know your Officers and membership. It is important to conduct a meeting with your officers and stewards and put together a team strategy that everyone can get behind.

At this meeting:

- Identify the objective of your efforts
- Outline the steps to be taken to accomplish the objective. Get and consider feedback.
- Outline the key person(s) tasked with the steps
- Develop concise fact sheets, talking points and materials needed.
- Develop walking points (e.g., flyers, notices, etc.) to be distributed
- Build a contact list of activist members, community contacts, congressional contacts etc.
- Build media contacts of radio, TV, cable, PBS
- Develop a social media platform or other electronic means of communication
- Consider a mailing
- Role of the Local in Public Input Community Boards Meetings and Mailer Councils
- Establish a communication line with the National Union
- Determine what, when and how you will communicate with the members

Target Key Community Local, State & Government Representatives

Local: Mayor, City Council, church leaders, local organization leaders, union leaders, business leaders, mailers, seniors, NAACP, Chamber of Commerce

State: Assembly, Senate, State House Representatives, Attorney General, County Supervisors, Secretary of State, Election Board

Government: Senate Leaders, House of Representatives, Government Oversight Committee, Board of Governors, Postal Regulatory Commission, PMG,

IMPACT ON COMMUNITIES

Economic Policy Institute (EPI) studies conclude the impact will be borne by the community that surrounds the mail processing facility that will be consolidated. The impact to communities far outweigh any potential savings or efficiencies for the USPS. The Phase 2 consolidations and the ability for the USPS to provide prompt, efficient services.

- ✓ Slower Mail Service for the communities
- ✓ Direct loss of community jobs
- ✓ Labor income
- ✓ Sales and property taxes
- ✓ Banking
- ✓ Utilities,
- ✓ Legal services
- ✓ Trucking
- ✓ Health care
- ✓ Restaurants
- ✓ Economic city and town losses



Planning For Public Information Meetings

- Who will attend, the location, who can help set one up
- Get there early for select seating (union gear vs anonymity)
- Sit in a "v" for maximum effect
- Who will speak (make it about service vs jobs)
- Will there be picket signs outside, or petitions for signature
- Pre-notice of Public Input Meeting to businesses, churches and community organizations at least two weeks in advance with a follow up
- Ask for commitments, taking actions to save our Mail Processing Plant



Regional Coordinator Tips & Talking Points

Mail Processing Facility Reviews (MPFR) policies emanate from the revised PO-408 and spells out the responsibilities of the varied levels of management's reorganized structure— *Division, District, Region and Headquarters*. The actual process is Top to Bottom.

- **Communications** to stakeholders occurs when the following MPFR process begins:
 - a. An MPFR analysis intent notice is issued.
 - b. Public meetings are scheduled
 - c. MPFR proposal is decided to be approved or disapproved.
 - d. suspending or resuming implementation, or other events, take place.

The stakeholders include at least, 1. the affected employees, 2. the employee organizations, 3. "appropriate" various levels of government individuals, 4. local mailers, 5. community organizations, 6. local media

- **Public Input** is "invited" on the proposed MPFR via a comment period.



The comments are intended to be used for discussion at the public input meeting. At the meeting further oral comments can be made followed by a short period for more comments. Then those comments are summarized and sent to USPS HQ for "consideration" and are supposed to be taken into account in the final decision.

- **Clear As Mud** public disclosure. USPS claim their MPFR analysis may contain commercially sensitive information such as operations, volume and service performance and are not to be disclosed before a review and redaction of data.

How the Postal Service Communicates on AMPs



To the Unions— Management issues a general interest letter almost simultaneously with other **SurveyMonkey.com** stake holders. Apparently not to give the Union too much advance notice to mobilize. Management leaves it to the Union at the HQ to notify their field.



To Employees - Management conducts a Stand Up Talk where they either read a script or they post the "SUT". They usually issue a notification one or two weeks prior to the SUT where it is claimed they are modernizing the outmoded network so as to get to a goal of 95% on-time delivery.

They then localize a paragraph to the specific site on the "business case" initial results and disclose that a public meeting will be had (usually in 2-3 weeks) giving the **date, time and location**. And advising that employees can not be on the clock to attend.

They solicit comments and direct them to the surveymonkey.com/mpfr for the specific target locale

To The Public— they issue a nondescript notice, in 9 point font, to shareholders. The notice is titled: **Mail Processing Facility Review Notice of Public Meeting**. Usually the notice claims there is an initial business case for the proposed changes. In the middle of a 87+/- word paragraph will be the date, time and location of the public meeting in 9 point font.

The notice will outline a scripted business case supporting their changes, the future of the current facility, and claiming no changes to retail offices, postmarks and a claim that delivery "times" and mail drops will not change. They provide surveymonkey input info & deadline 15 days or so after the meeting.



As Local Union Leader(s) you should have dual goals such as:

- ◆ Educating the membership on the impact of DFA on their jobs, job security and livelihood.
- ◆ Educating and mobilizing the community to preserve their Postal Service and postal services.

These goals are somewhat tangential (as the PMG likes to refer to his strategies). This means that while postal workers are concerned about their job security we are also concerned about the quality of service we provide to the community as civil service employees. But, our FOCUS has to be separate when addressing our audiences.

OUR COMMUNITIES' concerns

OUR MEMBERS' concerns

⇒ **Access to USPS Retail Services**

Postal officials claim that retail services will not be affected. Our goal should be to counter act this claim by raising legitimate concerns over expiring leases, relocation of offices, SDC impacts and how the DFA plan targets closure of thousands of retail P.O.s.

⇒ **Reasonable Prices**

Not much, if any, information is revealed on the PMG's continued drive to increase revenue by raising postage. Our goal should be to cause alarm over the rapid increasing cost of mailing, the revised slowed down delivery standards of DFA and the costs of DFA.

⇒ **On Time Reliable Delivery Services**

Our goal is to question the changing delivery standards by this and previous PMGs and the claim of on time deliveries as opposed to real time experiences. And delays and potential delays of mail service.

⇒ **Community Input in Postal Issues**

Our goal is to educate the community, local & state civic leaders on the proposed changes and encourage community contact with their elected leaders.

⇒ **Postmark Retention**

USP claim the local postmark will not change. Our goal is to point out what will change.

◇ **Providing Quality Service**

Our goal is to point out how America may be poised to blame postal workers for the failures of DFA and delayed mail, long lines and postage hikes.

◇ **Disruptions to Work and Home Life**

Our goal is to point out to our members (not the public) DeJoy's DFA plan's impact to their schedules, assignments and livelihood which includes the continued reversions, abolishments, involuntary forced reassignments. But also include Special Transfer opportunities, retreat rights and the principle of seniority protections.

◇ **Lays Offs and Job Security**

Our goal is to educate the workforce on the CBA's Article 6, 12, 37, 38, 39 provisions and applicability to the DFA plan, as well as, the AMP process and what efforts they can assist in to protect America's postal services.

◇ **Work Hours and Treatment**

Educating our membership on the importance of their status as "Essential Government Workers" and their standing as a civil servant postal worker and how the DFA, while claiming to empower workers, does the opposite especially when it comes to hostile work places and mistreatment by bosses.

INITIAL LOCAL UNION ACTION

When National receives a Notice of Intent to Conduct MPFRs, the President's office receives it and directs it to the Exec. VP who then assigns it a number and issues the notice to the Industrial Relations Department for dissemination to the field.



Upon receipt of a MPFR Notice, the Local should date it and then call a meeting of the Local's Executive Board to:

- *Review the Notice* and determine time lines of the study and associated events.
- *Discuss the Local's mobilization* efforts and prepare a report to the membership. The Local should not allow management to be the sole source of information of the impending study and likely consolidations.
- *Determine a budget* to fund the Local's efforts involving possible lost time, mailings, leafleting, ads, pickets, news releases, bulletins etc.
- *Establish a Core AMP Committee* that will deal the consolidation threat including attendance at public meetings; soliciting for and participating in community leafleting.
- *Conduct an internal meeting of all stewards, officers and local union activists* so that everyone is on the same page and everyone is given the opportunity to be involved in dealing with consolidations.

CAN AN MPFR AND AMP BE GRIEVED?

The simple answer is yes, pursuant to Article 3, 15 and 19. However, such a grievance places the burden of proof that a violation of the CBA has occurred on the Union. Although the Notice of Intent and the MPFRs are tangible events there is in effect no action taking place yet related to wages, hours and working conditions which may have been violated. Actual consolidation challenges are usually based on flawed data utilization.

A Local's "initial" focus on MPFR should not be grievance activity. The focus should be on :

- educating the membership internally and mobilizing them to protect their work which is to provide service to the community.
- Educating the community including civic, religious, service organization and the general public on the possible impact to their postal services.

If and when a decision is made to go ahead with consolidation(s), the opportunity for grievance activity, dependent on the fact circumstances, will present itself usually based on a challenge that data used for the AMP is flawed in some manner. But, that is a fight for another day.

Of course, management's misapplication of the contractual Principles of Seniority and Reassignment and pertinent craft article provisions if occurring requires timely grievance activity.

The focus now is on combating the impact to the community, the postal service and work we do for the American public.

GET YOUR FACTS TOGETHER

Highlights of Management's "facts" issued to the public in written format

- DFA anticipates 60 new RPDC to open to make sure mail/packages processing network meet the MPFR consolidations.
- USPS is investing \$40 billion to modernize the processing & delivery network to take advantage of state-of-the-art technology processing mail/packages more efficiently
- MPFR studies and consolidations will ensure that plants/facilities are aligned to support the new RPDCs and USPS will seek and consider customer and public input during the process.
- USPS will continuously communicate and work with the unions, monitor the impact of changes and make adjustments as appropriate.
- There will be no career employee lay-offs and employee reassignments and reduction of non career employees will be made per the union contracts.
- The consolidation process is intended to have minimal impact on customer services. Business mail, postal operated retail units (Post Offices) and delivery services are "expected" to remain unchanged in most cases.

To combat the negative aspects of DFA, Union Reps need to know what USPS is claiming and what the actual facts are.

Here are some:

⇒ *In order to consolidate and reduce the network the USPS changed the delivery standards twice. In 2015 delivery time went from 1.8 days to 2.1 days. (in reality many experienced 2 to 4 days delivery) In 2021 it went from 4 to 5 days depending on where it is going. (it was 3 days for any destination). DFA slows down the mail.*

⇒ *The Government Accountability Office's initial assessment of DFA revealed USPS did not say where it was getting the \$40 billion to invest \$20 billion of which is suppose to go to improving mail processing. GAO found that the USPS claimed 91% on time delivery was due to the slow downed delivery standard changes.*

⇒ *Management is lax on timely notification of it's network changes. An internal example is the changes to the Area Mail Processing (AMP) consolidation process they made in Dec. 2022 with notification to the Union six (6) months later. The PMG has even scuffled with the Postal Regulatory Commission (PRC) in an effort to shield his plans from public scrutiny. The PRC has criticized the PMG for not keeping them in the loop as they are concerned over community impacts of the DFA's changes.*

⇒ *Involuntary employee reassignments 40-50 miles away impacts small businesses in the community in which postal employees currently work.*

⇒ *The key words in management's claims on retail impacts is that it will be "minimal" or "in most cases" unchanged. The PMGs has consolidated delivery operations, slowed collection services, and is allowing post office building leases to lapse with a DFA plan to reduce 10,000 retail operations.*

POSTAL PROPAGANDA MACHINE



By Law the Postal Service is required to solicit comments from the public and also consider those comments in postal service changes. USPS has deep pockets when it comes to propagating it's intentions.

The Local Union Leadership needs to know what media platforms management is using, how to access them and when necessary how to respond; USPS media resources include: *USPS Newsroom; Twitter (X), Instagram, Pinterest, LinkedIn, YouTube, Facebook, usps.com; and the intranet.*

Likewise, all officers, stewards and members should be aware of the USPS Media policy found in the Administrative Support Manual. The keys to this policy is not to use postal equipment, not to be on postal property and not to issue statements on behalf of or for the U.S. Postal Service. Likewise, caution should be taken not to be accused of tarnishing the "brand" of USPS. Keep abreast of their propaganda at usps.com/deliveringforamerica

CAN EMPLOYEES SPEAK OUT AGAINST THE DFA?

The response is "Yes" but not as an employee speaking on behalf of USPS. Union members are not under a gag order when it comes to speaking out on postal service issues. When the Local communicates with the media, or public or even internally with members for that matter they should do so via and on behalf of the authorized and recognized labor organization pursuant to ELM Chap 9.

This premise comports to the provision of ELM 667.12, the National Labor Relations Act and other applicable statutes.

667.12 **Engaging in Campaigns for Changes in Mail Service**

Employees in active status must not engage in campaigns for or against changes in mail service. This regulation must not be construed to infringe on the rights to participate in labor organizations. ←

PREPPING FOR THE COMMUNITY MEETING



The Local's leadership should designate two core groups. 1. For preparing and coordinating the Union's efforts at the community meetings, (the **Key Community Committee**) and 2. For educating and mobilizing the membership and prepare them for the workplace displacements (the **Membership Mobilization Committee**)

Key Community Committee (KCC)

The KCC should be made up of 5-6 of the most involved activists (or if push comes to shove volunteers). KCC will:

- Review all pertinent notifications/documents
- Develop talking points for the Meeting
- Coordinate who does what at the meeting
- Pre-meeting canvassing and post meeting activities

Understanding Who The KCC Will Be Dealing With



Management's MPFR "communication" scheme is threefold:

1. **Issuance of a written Notice of Intent** (to conduct an analysis) with the date of the notice being the start time for the process. This notice invites comments to be submitted to USPS.
2. **Public Input Meeting.** This is a non descript notice issued to so called "stakeholders." There will be employee stand ups, written notice to the National Union and a non descript public notice.

3.5. Public Input Meeting

MPFO, Corporate Communications, and local management begin preparations for the public input meeting to share the MPFR findings and address any concerns.

Communication to stakeholders of the public input meeting must be made at least 15 days prior to the public input meeting date.

Within 45 days after submission of the analysis, a public input meeting must occur. This may be conducted in person or virtually as determined by a Postal Service representative. Fifteen days are provided for the public's submission of additional written comments after the meeting and for the summary of the meeting.

A Corporate Communications boss, likely local USPS communications specialists and a variety of plant managers will conduct the meeting. (*Be aware of the possibility that management may try to have a virtual meeting. This kind of*

meeting will undermine the purpose of a public meeting as not everyone has the capability to "zoom" in. The Local should contact their Congressional Reps and BOTH US Senators, Mayor and Civic Leaders to put pressure on management to have an in person meeting.)

The Corporate Suits will follow a "corporate communication plan." The HQ/Area suits in attendance are well versed in following their scripted communication plan which will include management's version of their "organizational goal" with talking points, scripted messages, slick power point, assurances of no negative impact on those in attendance. They are prepared with tactics to disarm hostilities.

The KCC attendees must be fact filled, prepared, not intimidated, not hostile and more inquisitive in their presentation at this meeting. The APWU KCC attendees are both postal workers AND members of the community. We have a right to be present and give voice to our community's issues.

3. **Decision to Consolidate** is announced after the 15 day comment period and the approval is given for the consolidation. Usually there is a six month "transition period". However, if the consolidation involves only destinating mail operation consolidation the period is shorter. If both originating and destinating operations will be consolidated then the transition period is required to be six (6) months.



TIME WAITS FOR NO ONE....the Local must not dally or waste any time.

While the process appears to take place over an 8 month period, the reality is that postal bosses in DC have already decided what operations will be consolidated, what plants will close and what local post offices will be shuttered. They are playing a time game to meet their statutory obligations as close as possible.

DEVELOPING AND VALIDATING TALKING POINTS

Usually a “talking point” is a topic that invites discussion or arguments. The USPS Corporate team will have theirs and be prepared to counter almost all counter points at a community meeting.

The KCC needs to develop talking points with facts, in a manner that when presented:

- ◆ the attendees will be educated
- ◆ The attendees will be agitated
- ◆ The attendees will be more willing to mobilize and take actions to combat the consolidation of plants, retail and delivery units that will slow down mail service.

Example: *KCC Member- “The Postal Service changed delivery standards, or what the PMG calls “time to transit” in 2015 and 2021 in which now mail takes longer to deliver. To consolidate mail processing plants in (City) the delivery standards had to change to meet the new standards isn’t that correct?”*

Corporate Response– “The American public deserves reliable, predictable postal service delivery. The DFA is intended to be more efficient with a 98% delivery time in 1-2 days.” (or some sort of corporate talking point)

KCC member- “Thank you but you didn’t answer the question– to consolidate the PMG had to change the delivery standards. Even the Postal Regulatory Commission reported that mail was being slowed down”.



Then you stop! No matter what their response is. You don’t want to become annoying. Let another KCC team member pick up the baton after a few others speak. Pay attention to other community comments or questions for an opportunity to interject more talking points.

Of course, if you and your team have a different approach to the meeting “discussions” by all means go with what you know. However, understand your goal– *it should be to get community support to help stop consolidations and mail service slow downs. It is NOT to protect bid assignments or protect employee jobs.*

The reality is, most of the public is not going to be overly concerned that postal workers have to relocate 1 to 50 miles to keep their good paying government job. They are concerned about their businesses, their mail service and post office. **Stay Focused !**

SLOW DOWN OF MAIL SERVICE



Although the PRC is an independent regulatory agency, since the recent Postal Reform Act it now gets its funding from the USPS Board of Governors and is understaffed. Nevertheless the PRC is interested in the PMG's DFA and despite opposition from the PMG has opened up an inquiry. The PMG hinted at legal action but has not yet sued.

In a relatively recent report [Docket N2021-1] the PRC revealed some interesting factors which of course USPS does not agree with and will likely jump up and say the "advisory opinion" revealed that slowing down the mail did not violate the law. But is that really the point? Here are some excerpts:

On the record in this case, the Postal Service admittedly proposes changing service standards based on surface transportation distance, where pairs of ZIP Codes (known as Origin-Destination, or OD, Pairs) that are further away from each other will experience a longer expectation of delivery time than those that are closer. See USPS-T-1 at 16-17. While the Postal Service argues the distance-based criteria are objective and cannot possibly amount to discrimination—in part because any method of transportation will have limitations based on distance—the fact remains that service standards are proposed to be changed based on distance.¹⁵³ Therefore, a mailer primarily sending a product that is intra-SCF will not experience a service change at all. A mailer sending the same product but that is inter-SCF with a drive time of more than 3 hours would experience a change in service.

While parties argue that the Postal Service's proposal is not reasonable because it decreases the service standards for a substantial portion of the mail, such a position in and of itself is untenable as a general proposition. It would require that any decrease in service standards would by default be inconsistent with the policies of section 101. The Postal Service makes the argument that the implementation of its proposal will result in increased reliability, efficiency, and economy, with customers valuing consistency and reliability above speed of service. However, that too, lacks general credibility because the Postal Service has not demonstrated that it can achieve such reliability, efficiency, and economy, nor has it demonstrated that customers rank the attributes of service as the Postal Service contends. See Section VII.A., *supra*. Implementation of the Postal Service's proposal, and achievement of the articulated goals, impact the conclusion as to whether it is reasonable pursuant to section 403(c).

The fact is management's changes are and will delay mail delivery !!

Strategic Focus #13: Achieving Ambitious Service Targets

Congressional Information Request:

Review of the ability of the Postal Service to meet performance targets established under section 3692(a)(1) of title 39, United States Code.

USPS Response:

We are committed to ultimately meeting or exceeding 95 percent on-time delivery across mail and product classes. We have improved service performance and exceeded our targets across our entire product line, for both mail and packages, as the table below shows.


Figure 9. On-time Service Performance for FY 2022 Q3 and Q4

Mail Class	FY 2022 Q3 & Q4 Performance	FY 2022 Target	FY 2021 Q3 & Q4 Performance	FY 2021 Target
First-Class Mail	93.20	91.00	88.02	84.88
Marketing Mail	94.67	91.84	91.58	86.62
Periodicals	86.68	82.67	80.88	86.62
Package Services	92.09	90.00	88.08	90.00

The targets for section 3692(a)(1) of Title 39 for FY 2023 will be submitted to the PRC. Progress in achieving these targets will be reported beginning in the next semiannual report.

Source: USPS

USPS management claims they are meeting or beating on time delivery across all mail classes and have improved. But, they are less than forthright because is you change the standard to allow for built in delayed mail (in FY 21 Q3 & Q4) you should, of course, do better.



Service Talk

July 28, 2023

Optimized Mail Transportation

Providing world-class service to our customers while exercising fiscal responsibility is a key objective of our 10-year Delivering for America strategic plan. Now in the third year of the plan, the Postal Service is continuously transforming and strengthening our business model. Part of the transformation involves improving our transportation network efficiency — including a change at this office to optimize our process for outbound mail.

The number of transportation dispatches will be consolidated for select offices. The process for outgoing collection mail dispatch will be combined and transported with existing morning trip(s). The morning dispatch of mail will arrive as scheduled and outbound collection mail from the previous business day will be transported at that time.

Customer service will not be impacted with this change and remains aligned to meet product service standards.

Each facility is still required to follow all outgoing mail process procedures for the use of Mail Transport Equipment Labeling placards; Registered Mail; and staging and securing the mail at the close of business each day. Offices are requested to condense mail transportation equipment as much as possible for space utilization while maintaining all required separations.

Thank you for all you do every day.



Customer Communication

Thank you for calling, and thank you for your business.

Due to transportation changes at our facility, all mail and packages dropped today will be sent on the first dispatch tomorrow morning.

We do not expect any impact to customer service from this change, as our transportation remains aligned to meet our published mailing and shipping product service standards.

This change is part of our ongoing efforts to improve customer service with greater reliability and improved efficiencies.

Again, thank you for doing business with the United States Postal Service.

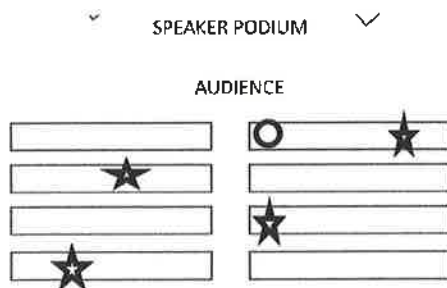
But even their SDC consolidations will cause delays as mail dropped of at a post office, no matter the time of day, will NOT be sent out until the 1st dispatch the following days. Gone will be same day mail pick up to the plants.

ATTENDING THE MEETING

Once the Public Meeting Notice is issued revealing the date, time and location of the public meeting, the KCC should visit the location **days ahead** of the meeting to assess parking, access and to get a feel for the place and likely set up.

Meet In Advance of the meeting to:

- Determine who will attend
- Who will speak first
- What the KCC will wear [Yes, professional dress should be the call of the day. ONLY ONE member should wear a prominent APWU jacket to let those in attendance know of the Union's presence. Everyone else should be dressed in business casual.]
- Practice delivering talking points. Anticipate Postal Corporate responses and counters
- What time the KCC will be at the location. (Think about staggering arrival by a few minutes)
- Where the KCC members will sit. Because you visited the site ahead of the date you will have an idea of the kind of seating arrangements the Corporate suits will set up. **Remember: the meeting will be attended by a very small segment of the community. You are not in an "audience" this is a public comment event.**



Classroom Arrangement unlikely



Depends on location & space



Most likely arrangement



Unlikely U shape but possible at a large venue



lecture theater seating without aisle unlikely

★ KCC speakers seated separately

○ Officer flying union colors. Speaks up only if USPS mentions working with the Union.

Pay attention if microphone are provided. If management has ground rules follow them. Stagger the

speakers on the mics. Central seats are good. Seats to the upper right of the presenter are best as it allows for attendees to see you. Sitting in front with Union colors will draw attention that the postal worker union is present but unlikely the presenter will recognize you. End and middle seats are good also. When attending the meeting DO NOT chit chat with managers. And remember you are not in an audience. Management is not there to entertain, but to listen and respond accordingly.



MORE ON TALKING POINTS

POSTAGE INCREASES

- At a USPS Board of Governors (BoG) session in May 2023 the PMG told the BoG mailers need to be prepared for continuing postage price increases at an “uncomfortable” rate.
 - Postage has gone up 5 times under this PMG– 24% which is more in 3 years than the previous 11 years.
 - Despite getting \$107 billion in debt relief under the PSRA (Postal Service Relief Act) the PMG still is after more increases.
- The PMG promised the DFA would have the postal service break even by 2023 but it failed to do so.
 - When postage goes up 1st class mail volume drops while revenue increases. PMG acknowledged that mail use will decline when price increase are implemented but claims it will decline anyway,
 - Postage will go up 2% in January 2024.
 - Mailers and customers are concerned that another increase will be imposed in July 2024 and then twice per year.

KCC talking point- “ Postage has gone up 5 times under this Postmaster General. Instead of consolidating post office why doesn't the Postal Service bring in revenue from New Services”

Corporate response: “ We need the revenue to deal with inflation and rising costs, and to invest in our infra structure, fleet and to be able to deliver efficient, reliable on time delivery to America under DFA. Federal law prohibits the postal service to venture into other than postal services.” etc.

KCC counter point by another member: “ You said the law prohibits providing other than postal services but didn't the Postal Service Reform Act passed last year allow for non commercial non postal services? So why consolidate, raise postage and not take advantage of new revenue with new services? [Note the PSRA Section 103 lifts some of the restrictions on non postal services imposed in 2006 PAEA such as DMV, Fishing/Hunting licensing etc.]

Corporate response: “We do have some postal banking pilots and are looking into the feasibility to proffer more.

KCC talking point for some other member: “The Government Accountability Office said that the Delivery for America Planned \$40 billion investment in changing the postal network and consolidations but where that money will come from has not been disclosed. Can you tell us where the PMG is getting that money if not by increasing postage more?”

Corporate Response: “By streamlining our network and providing more efficient reliable services we will have achieved cost savings while not impacting service to our patrons and customers and not reducing the workforce by any lay-offs.

CONSOLIDATION PROCESS IMPACT ON CUSTOMER SERVICE MINIMAL?

- USPS closes hundreds of post offices yearly “temporarily” for a variety of reasons such as weather, fires or other emergencies or claimed “safety concerns”.
- In Mid 2022 in a filing before the PRC Postal managers announced that 170 temporarily (suspended) closed Post Offices were to be permanently closed (discontinued). They were closed by Dec. !
- Postal management informed the PRC in 2023 it does not have nor intend to have postings showing discontinuance status of suspended post offices.
- Information indicates USPS is canceling leases on pretexts. Some leases cancelled on the grounds of safety concerns where the owners are not aware of those issues*. Other reports indicate that USPS claims owners are not renewing the lease when it is USPS that is refusing to do so. [* see Sept/Oct 2023 *American Postal Worker* Executive VP’s article]
- USPS has 25,300 leased facilities. Specific information can be found at [usps.com Leased Facilities Reports](https://usps.com/Leased-Facilities-Reports) by state. USPS owns 8,500 post offices. Info on owned P.O.s can be found at [usps.com Owned Facilities Reports](https://usps.com/Owned-Facilities-Reports). [KCC should research potential local P.O. lease losses by reviewing these reports]
- Function 4 offices do not utilize the same data base for operations, volume and workhours that Function 1 offices utilize to conduct MPSRs.
- So far 297+ Post Offices (i.e., delivery units) are impacted by the SDC (Sortation and Delivery Centers) implementation process. Although there is an MOU that Post Offices will not close because of SDCs there are and will be impacts to service in regards to excessing due to less clerical work allied to carrier functions, Function 4 reviews, lost/cancelled leases etc. [There will be more SDCs and more impacts]



Classified Unit= station/branch operated, owned or leased by USPS
Stations = located within corporate limits or city carrier delivery city/town in which main P.O. is located.
Branches = located outside the corporate limits or city carrier delivery area of the city in which main P.O. is

KCC Member- *“The public notice for this meeting indicated the impacts to our retail post office will be minimal. But the data used to consolidate plants is not the same used for post offices. Will any of our stations or branches be impacted?”*

Corporate Response: “We are implementing the study to determine a business case for consolidating plants and providing more efficient use of equipment and providing reliable dependable service to our esteemed customers.

KCC Other Member- *“You didn’t answer the question if any of our stations, branches or post offices will close? Are any leases up? Will window staff be reduced with the consolidation or with any Sortation and Delivery Centers?”*

Corporate Response: “Our feasibility studies will take into account impacts to mail service and also customer input will be taken into account we expect minimal impacts to retail services.

What if the Corporates respond truthfully? Don't hold your breath but if they do— *they do!*

- *The Corporate responses on the example talking points are just that— examples.*
- *The KCC needs to be prepared for all kinds of responses and scenarios, especially those that present themselves when the general community raises points. Listen for key triggers!*



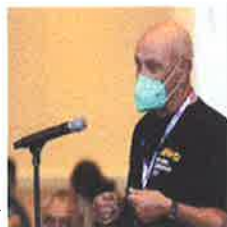
Postal Promises to Work With the Unions and no career employee lay-offs

- Management has not been fully transparent with the Union in their DFA implementation prompting RFIs and ULPs.
- Management deliberately delayed informing the Union about the new consolidation handbook (PO 408) revisions for 6 months.
- Impact Statements issued to the Regions usually just reference DFA power point presentations with no real information.
- In some Regions management is claiming they held the required contractual meetings with the Union, despite the Union not in attendance.

KCC presentations or inquiries on these issues should ONLY be made if management mentions the cooperation to and working with the Union. Then:

KCC Members Flying Union colors should rise and state/ask:

“You say the you are communicating and working with the Union. Why then did Postmaster General fail to notify the Union of the December 2022 changes made to the policy and practices on consolidations of processing plants until six months later? How is that communicating and working with the Union?”



Cost Saving Efforts

- The PMG's promised positive net income within his DFA's first three years failed to be kept.
- Optimizing the network and maximizing labor productivity resulted in 10 million work hour reductions in 2022 and 15 million work hour cuts through February 2023.
- The PMG's DFA plan claims the \$40 billion to be invested in infrastructure and transportation is “self funded.”
- The PMG plans to generate \$44 billion by raising postage rates twice per year.
- In June 2023 3Q FY23 USPS reported a \$1.7 billion loss.
- Consolidation efforts are not new. In 2011 under the NRI (Network Rationalization Initiative) USPS announced the consolidation of 252 processing plants to save \$865 million, of which 141 were consolidated. An additional 82 plants were announced in Phase 2 to save \$568 million
- USPS uses total operating expense and mail processing productivity (mail pieces processed per work hour) to manage costs.
- In a 2019 OIG report, after the 2015 service standard changes from 2014 to 2018 mail processing costs increased.
- Previous consolidation efforts have failed to produce the projected savings and the 2015 delivery standard changes slowed the mail. The 2021 delivery standard changes do as well.

KCC Member- *"The public notice FAQs said that the potential savings will be revealed ahead of the community meeting. What are the potential savings on this (state site) consolidation?"*

Corporate Response- "We had a projected loss of \$160 billion and have improved that loss to only \$90 billion. The study when finalized will give a projected savings for this effort."

KCC Other Member- *"The PMG had promised that in the first three years of his 10 year plan there would be a positive net income. But in June 2023 a \$1.7 billion loss was reported. Why is our mail processing plant and post offices being targeted?"*

REMEMBER

- ◆ Don't get into a tit for tat
- ◆ Don't hog the microphone let others in the community speak. Rotate KCC members
- ◆ Practice delivery of your points before the meeting
- ◆ Anticipate USPS counter points and prepare yours.
- ◆ Do not get argumentative
- ◆ Do not be intimidated.

Corporate Response: "We have had a \$48 billion cost reduction already but had to face additional \$3 billion for inflation. Like everyone else we to deal with inflation despite our good efforts to manage controllable costs."

KCC Another Member: *"The Postal Service uses total operating expense and mail productivity which is pieces processed per work hour to manage costs. You have cut workhours by 25 million in the last two fiscal years but still had no net savings. Our plant is a productive plant why is it being targeted?"*

Corporate Response: "We have implemented many strategies in the plan's first 3 years. We have new revenue streams and a lot of our cost saving will come from reducing air transportations and optimizing our ground transportation network and yes we are improving employee staffing and scheduling ,as well as, eliminated redundant processing operations."

KCC Different Member: *"Well you really didn't answer the previous question but I have another question. The PMG's plan is to generate revenue by raising how much we pay for postage, I believe as much as \$44 billion increase in revenue from what we pay for postage. He plans on raising postage twice per year. You've cut hours, you changed delivery standards, has our Congressman and Mayor been advised of this plan to consolidate our post offices? Why is our processing plant being targeted?"*

Corporate Response: "We sent a notice of this meeting to all our stakeholders which includes both local, and federal elected officials, businesses, and the general public. Again, we will be conducting a feasibility study to determine if there is a business case for changing mail processing operations and consolidating and the public will be informed of the results and be given an opportunity for input."

KCC Another member: *“Consolidations are not new. In 2011 252 were planned and 141 mail processing plants were consolidated so that \$865 million would be saved and another 81 were targeted for consolidation. Yet, in 2019 Office of Inspector General reported that from 2014 to 2018 mail processing costs increased. The projected savings were not reached. Why is our mail processing plant and community being targeted?”*

Corporate Response: “ We have invested in new technologies and equipment with 259 new package sorting machines. We have developed Regional Processing Centers and Local Processing Centers and committed \$7.6 billion to create a new network to reduce costs including transportation and have on time delivery. We believe that the investment in people, equipment and buildings will work this time to reduce costs.”



Any mention of saving on transportation costs should trigger KCC talking points after doing the necessary homework on the miles the mail will be transported to elsewhere to be processed and then trucked back to be delivered.

This is determined by reviewing the notification of the study regarding “originating vs destination” mail processing changes. Notification may come from the Public notices, Stand Up Talks or even HQ letters to National disseminated to the field. Check facts on:

- Mileage to and from impacted plants
- Propensity for inclement weather
- Driving routes and alternate routes
- HCR contract costs

Then prepare your talking points and counter points and assign them to specific KCC members.

IMPACT TO THE COMMUNITY

- The PMG's DFA, per a recent OIG report, does not have supporting evidence to show how demographic groups could be disproportionately affected by operational and delivery standard changes.
- USPS claims that such evidence is not required or necessary. But the community's population does have subsets of groups by age, nationality etc. Certain parts of the nation are affected differently under DFA.

KCC Member: *The OIG has found that the DFA and consolidation efforts do not have supporting evidence on how these changes affect demographic groups in our community. Why doesn't the PMG believe that it is important and necessary to consider the people and their needs?*

Corporate Response— At this point does it matter?



Engage Your Elected Representatives

- The USPS Public Notice of the Study and proposal was supposed to be sent to all stakeholders including federal and local civic leaders. **DO NOT TAKE THAT FOR GRANTED.** Reach out to and engage your two US Senators and your District's Congressional representative, city or township's elected leaders. Invite them to the meeting.

REACH OUT TO THE COMMUNITY

- Reach out to churches and communities groups. Educate them on the negative aspects of consolidations. Notify them of the Community Meeting and invite them to attend and ask for their prayers.
- Plan and conduct a business to business walk about. Visit the local businesses and educate them on the negative aspects of the proposed consolidations. Talk to the sales person **AND** the owner to get buy in and invite them to attend the Community Meeting.
- Plan neighborhood walk abouts and leaflet the homes (on fences, screen doors, porches (stay away from the mail box). Prepare flyers. Do not make them too wordy. Have them fact based/fact checked. Include union affiliation.
- Visit Senior Citizen Centers and Homes. Speak to the Administrators for access and opportunities to talk to our elders who rely heavily on postal services. Educate them on the negative aspects of consolidations and their opportunity to assist in stopping them. This includes attending the Community Meeting and just as important contacting their congressional reps to ask for assistance in stopping the consolidation. *Give them the contact information (phone number).* Bring them flowers or other small gifts.



ENGAGE OUR MEMBERSHIP

- Educate our members on the negative aspects to not just their jobs but the community they serve. Ask for volunteers.
- Give the members fact filled flyers to hand out on their neighborhoods and community groups.
- Keep them posted with internal bulletins and direct membership mailings.
- Keep them informed on contractual matters as well.
- **DO NOT** let management's propaganda be the only information members get about DFA.



REACH OUT TO THE MEDIA

- The Post Office got its early start as a means to spread newspapers via post roads and delivery of news gazettes. Editors were the first PMs.
- Newspapers and news letters are still delivered via the mails and delays affect the value of printed news.

Despite on-line news, printed news still is important to many communities. DFA will affect them all.

- The news media is always on the look out for stories.

HERE ARE SOME TIPS:

- ⇒ **Write a Press Release with a proper angle on community impact.**
- ◆ **Make sure it is an error-free copy that covers quickly all the bases (like the six success Qs)**
- ◆ **Write in 3rd person and get some quotes in there too so as to humanize the story.**
- ◆ **Don't be boring but don't get cute either.**
- ◆ **Avoid a whole bunch of dictum. Just the facts and the basic story.**
- ◆ **If there are photos of the post office or facility affected that could be included.**
- ◆ **Write the press release like a news story (research how to do one). Look up tools like AnswerThePublic. If necessary invest a little on a professionally written one if you are having difficulty.**
- ⇒ **Get your story released and picked up**
- ◆ **Find a listing of your local newspapers. Use USNPL (US Newspaper List) which provides them by city and state. Local city papers can be found on sites such as N2 Publishing Group**
- ◆ **Check out radio stations using Radio locator tools. Consider radio ads too.**
- ◆ **Seek out Local TV Stations. Use their websites or go to TV Guide, click Customize my listing and then enter your zip code.**
- ◆ **Local websites of blogs and Facebook groups may want to pick up your story. Use online networks like Patch Network**
- ⇒ **Prepare and Send Your Press Release Pitch**
- ◆ **Usually press releases are sent out via email (ironic since your story is about what is considered snail mail but that is a story for another day)**
- ◆ **Your email should tell the journalist why it is of interest to them.**
- ◆ **If possible personalize it to a specific journalist.**
- ◆ **The subject line should be eye-catching and indicate what the email is about and of interest. Believe it or not you can have your subject line checked out before sending it– use SubjectLine (free subject grader).**
- ◆ **Determine what you say in your email as to why it is of interest, what are the key points and how fast things are moving, include a contact point to reach you.**
- ◆ **Attach your Press Release. Remember give advance notice (usually 7 days for TV/Radio, 2 weeks for newspapers).**



USE THE U.S. MAIL

- If you have not already done so secure a Bulk Mailing Permit and be part of the mailing community and build contacts. Invite them to the meeting.
- Joint Postal Customer Councils and attend their meetings, functions and business sessions.
- Consider using Every Door Direct mailing. Time is of essence.

So your piece should be ready to go and fit the required length, height and thickness. Go to usps.com and use the everydoordirect link and use their on line tool link.

PICKET

- Plan and conduct informational picketing. Do so at a busy and visual location in front of a post office. If the plant is not centrally located picket in front of a busy post office station or branch.
- Send notices via mail to your members. Let them know it is not a strike and is an off the clock, not in uniform legal event and what they are protesting.
- Don't just rely on the mailing or a leaflet, do one on one canvassing and ask for their help.
- Plan your signage. Reach out to National for posters, signs, T-shirts and TALKING POINTS.
- On the day of the picket stay on public property. Do not block entrances, driveways or streets.
- Pace the picket line every four-six feet apart.
- Fly your Union colors and the US Flags.
- Get whistles at the 99 cent or Dollar store and hand them out to picketers.
- Select and assign a spokesperson but educate everyone on how to handle media
- Contact the media in advance (at least a week)
- Take photos.
- Make it fun, prepare and distribute chants
- Reach out to law enforcement as a courtesy.
- Prepare fact based leaflets. Thank those that take them.
- Do not engage in negative responses
- Have water and a first aid kit.
- Assign line captains to keep the line paced and moving.
- After the picket thank those that attended for their assistance. Pick up after yourselves .



OTHER TALKING POINTS

NOTES

- The law, the PRA, guarantees “prompt and reliable services. The proposed consolidations and delivery standard changes do not abide by the intent.
- The PMG bypassed the PRC and moved forward with his so called “modernization plans” and opposed the PRCs attempt to allow for public input and scrutiny.
- DeJoy sees regulatory agencies, and some laws as obstacles
- DeJoy sees contract provisions as obstacles.
- Locally generated mail will be sent outside of the local area to be processed and then trucked back for delivery delaying the mail and incurring costs.
- Consolidation of delivery units will cause unnecessary increased travel costs.
- The carbon footprint of double trucking will add pollutants. As not all vehicles are/will be electric.



POST PUBLIC MEETING

Prepare a handout to be issued at the end to those who attend the public meeting.(keep in mind USPS may pick one up).

In addition to outlining how to give further comments also list the Congressional and US Senate names and contact information. Ask they be contacted!

Supply talking point highlights.

If a picket is being planned in the near future provide the date, time and location and invite them.

Thank them for showing up. Attach union affiliation