



September 16, 2022

The Honorable Gerald E. Connolly
Chairman
Subcommittee on Government Operations
Committee on Oversight and Reform
U.S. House of Representatives
Washington, DC 20515-6143

Dear Chairman Connolly:

We are writing in follow up to your September 7 Subcommittee hearing, “Delivering for Pennsylvania: Examining Postal Service Delivery and Operations from the Cradle of Liberty.” We appreciated the opportunity to share U.S. Postal Service achievements in improving service reliability in Pennsylvania and nationwide, our strong Election Mail performance over the past two years, and our prevention and investigative efforts to combat mail theft and letter carrier robberies.

Because so few questions were directed to Postal Service witnesses during a hearing about postal issues, we wanted to take this opportunity to correct a number of items for the record. We stand by our testimony, which was supported by robust data and analytics. In contrast, it was surprising to hear the witnesses from the National Association of Postal Supervisors (NAPS) and the Postal Police Officers Association (PPOA) make a number of statements that were not factual, or at a minimum misleading.

Service performance is strong, irrespective of service standard changes

As we noted in the testimony, the Postal Service’s service performance in Pennsylvania is strong. Both Pennsylvania districts consistently have service scores exceeding 90 percent for mail and package products. While several Members of the Subcommittee stated the October 1, 2021 First-Class Mail service standard change lowered the bar in some way and is artificially inflating service performance, the truth is that First-Class mail continues to be delivered at the same steady pace in Pennsylvania as it did before the service standard change.

In fact, the average days to deliver mail in Pennsylvania when compared to pre-pandemic averages has remained steady for First-Class Mail. To further demonstrate that service has remained steady, we can compare the months before the service standard change to last month. In August 2021, two months before the official service standard change, it took 2.4 days to deliver a First-Class mailpiece in Pennsylvania. One year later, in August 2022, it took 2.35 days for First-Class Mail in Pennsylvania – a small *improvement*, but nearly identical from before the change. The chart in our testimony shows this in greater detail. It is clear that the service standard change had no measurable impact on First-Class Mail service performance in Pennsylvania, and in fact, provided greater reliability for our customers.

No Sorting and Delivery Center changes have been made in Pennsylvania

We were disappointed to hear the NAPS representative falsely assert that proposed Sorting and Delivery Center (S&DC) operational changes had already occurred in Pennsylvania, and that delivery operations had been moved to a new Tri-County facility. This is entirely incorrect.

As you know, as part of our 10-year Delivering for America plan, the Postal Service is working to modernize our delivery network. One component of this initiative is combining and centralizing carrier operations in new, large S&DCs over the coming years. This process will take time. The first S&DC will be operational in Athens, Georgia this fall. We are currently evaluating more than 100 new locations nationwide driven by operational and financial modeling to best serve our customers; however, contrary to any statements by non-Postal Service witnesses at the hearing, no changes have occurred in Pennsylvania (or anywhere else to date).

The goal of this initiative is to make significant improvements to the delivery network to better serve the American public and our business customers more efficiently and effectively. As part of this plan, carrier operations will shift, where feasible, to new S&DCs. These S&DCs will be optimized and configurable based on local market conditions – with many new S&DCs to be co-located in existing plants. These larger centers will have better infrastructure and adequate space, docks, conveyors, and material handling equipment to enable more efficient operations while modernizing and leveraging currently underutilized and vacant postal facilities around the nation.

Also, contrary to false statements or theories made by the NAPS representative and some Subcommittee Members, this initiative has improved environmental benefits. This S&DC model will greatly improve our transportation utilization by reducing time and the cost of transportation to facilities, and in cases of co-location, eliminating the need for transportation entirely. Additionally, it will allow postal delivery routes to be revamped to make them more efficient and cost-effective. Furthermore, this initiative will enable us to utilize more battery electric vehicles, since more routes would be at the optimal length to make such vehicles operationally feasible, and since the vehicles would be originating from facilities with enhanced electricity infrastructure to support the necessary charging stations.

It is important to note and share with your constituents that the creation of S&DCs will not change the locations of the Postal Service's retail units, including PO Box service. In fact, it will enable the Postal Service to maintain reliable and efficient delivery services for all customers while also improving the Postal Service's ability to appeal to both small and large shippers because it will enhance our ability to reach a much broader range of businesses and consumers under our new USPS Connect suite of products.

Authorized complement of Postal Police Officer numbers has remained the same

We also were surprised by knowingly false PPOA comments that the Postal Service is "defunding" our Postal Police. Our authorized complement of 581 uniformed PPOs and 117 supervisors are stationed at 35 worksites in 20 major metropolitan areas across the country. Contrary to statements made by the PPOA, the authorized complement of bargaining PPOs has remained unchanged for a decade. 581 were authorized a decade ago and 581 are authorized today. While attrition, combined with the inability to operate our training academy during the COVID-19 pandemic, has resulted in a temporarily lower number of PPOs on-board, we recently opened our hiring portal for PPOs and are currently conducting a training class now. More PPOs will be on duty soon.

Postal Police Officers are needed to protect facilities

The 35 facilities that PPOs patrol were selected because our security assessments determined these locations require the physical presence of an onsite, uniformed, armed officer. Security assessments consider the size of the facility, the volume of mail, where the facility is located, the number of employees who work there, and the need for evening versus daytime shifts.

Removing PPOs from those facilities puts those buildings and the employees and mail within them at risk.

While some Postal Inspection Service divisions utilized PPOs on a limited basis to conduct patrols and perform other duties off Postal Service property in prior years, questions were raised about whether these patrols conformed to the law, and whether they were effective. The Postal Service Law Department conducted an analysis of the law (18 U.S.C. § 3061) and determined that PPOs' law enforcement authority relates to the protection of Postal Service real property. Based on this determination, the Postal Inspection Service began to curtail the use of PPOs for law enforcement outside Postal Service real property.

The 2020 written policy clarification that was discussed at the hearing was done to protect the agency *and individual PPOs* from legal liability that could result from performing duties outside their jurisdiction. Additionally, a federal court held that the Postal Service's determination of PPOs' jurisdiction constituted a reasonable interpretation of the law.

Furthermore, it is important to note that the Postal Inspection Service already patrols streets to protect the mail and letter carriers. Postal Inspectors, not PPOs, regularly conduct street observations in areas where high numbers of letter carrier robberies and mail thefts have been reported. This is consistent with the differences in jurisdictional authority of Postal Inspectors and PPOs pursuant to 18 U.S.C. 3061.

The Postal Inspection Service reviews every mail theft complaint

We wanted to correct your statement that only 0.5 percent of mail theft complaints are investigated. The Postal Inspection Service reviews every mail theft complaint that it receives. The Postal Inspection Service wants it to be as easy as possible to submit a complaint, but that results in the Postal Inspection Service receiving many nonactionable complaints, or complaints that are actually about general delivery issues and not related to a criminal offense. It is also important to note that complaints, investigations, and arrests are not one-to-one. One investigation and arrest may resolve dozens if not hundreds of mail theft complaints.

Mail theft prevention and letter carrier protection continues to be a top priority

The Postal Service agrees with Subcommittee Member and witness comments that crime prevention should be a high priority, but we strongly disagree with assertions that the Postal Inspection Service is not actively engaging in such efforts. The Postal Inspection Service continues to employ a national strategy to address mail theft and letter carrier robberies. This national strategy includes and is not limited to:

- Improved physical security of mail collection boxes, including pilot projects testing enhanced security locks
- Close collaboration with local and state law enforcement to step up patrol arrests whenever they observe mail theft and increase intelligence sharing and reporting
- Maintaining a strong partnership with the U.S. Department of Justice on the investigation and prosecution of mail theft and violent crimes affecting postal employees
- Participation in financial crimes task forces consisting of local, county, state, and federal law enforcement officers
- Deploying additional Postal Inspection Service personnel, known as "jump teams," to areas with high volumes of letter carrier robberies and mail theft

- Utilization of the latest technology and techniques to target cyber-enabled financial crimes, including those associated with mail theft
- Utilization of the Postal Inspection Service's rewards program, which provides monetary rewards for information leading to the arrest and conviction of offenders

In July, the Postal Inspection Service launched an initiative of highly focused prevention and enforcement actions aimed at mail theft and carrier robbery crimes. Postal Inspectors have developed supervisor-led talks that stress employee safety and the need for maintaining accountability over the keys carriers use to access locked mailboxes and containers. Additionally, Postal Inspectors educate letter carriers on how to avoid situations that pose a special risk to themselves or to the security of the mail. The education outreach efforts include employee training videos and Stand-Up Talks about crime prevention and key accountability.

We trust that this information helps clear up the misinformation that was shared at the recent hearing. If you have any additional questions, or need more information, please let us know.

Sincerely,

A handwritten signature in black ink, appearing to read "Peter Pastre". The signature is written in a cursive, flowing style.

Peter Pastre

cc: The Honorable Carolyn Maloney, Chair, Committee on Oversight and Reform
The Honorable James Comer, Ranking Member, Committee on Oversight and Reform
Subcommittee on Government Operations Members
Pennsylvania Congressional Delegation