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AMERICAN POSTAL WORKERS UNION, AFL-CIO and SAN FRANCISCO LOCAL 2, AMERICAN
POSTAL WORKERS UNION, AFL-CIO

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO/OAKLAND DIVISION

AMERICAN POSTAL WORKERS UNION, AFL-CIO and SAN FRANCISCO LOCAL 2, AMERICAN POSTAL WORKERS UNION, AFL-CIO,

Plaintiffs,
v.

UNITED STATES POSTAL SERVICE,
Defendant.

Case No. CV-12-05327 YGR
REPLY DECLARATION OF ROBERT PRITCHARD IN SUPPORT OF PLAINTIFFS' MOTION FOR A PRELIMINARY INJUNCTION

I, Robert Pritchard, in lieu of an affidavit as permitted by 28 U.S.C. Section 1746, declare as follows:

1. I am the elected Director of the Motor Vehicle Services (MVS) Division of the American Postal Workers Union, AFL-CIO (APWU). In that capacity, I have submitted two previous declarations in support of Plaintiffs' Motion for a Preliminary Injunction in the abovecaptioned case.
2. On October 31, 2012, I received a packet of documents from the Postal Service. These documents included a letter dated October 26, 2012 (a true and correct copy of which is attached hereto as Exhibit A) from Patrick M. Devine, the Postal Service's Manager, Contract Administration, for the National Agreement between the Postal Service and the Union; revised Form 5505s for each Postal Vehicle Service ("PVS") facility in California (a true and correct copy of which is attached hereto as Exhibit B); and "HCR Cost Estimates," with an accompanying spreadsheet (a true and correct copy of both of which is attached hereto as Exhibit C).
3. Mr. Devine's October 26, 2012 letter stated:

On Friday, October12, the Postal Service met with you to discuss the Postal Service's proposal to convert all of the Postal Vehicle Service (PVS) operating in the Pacific Area (excluding Hawaii), to Highway Contract Route (HCR) service. Subsequent to that meeting, the Postal Service reviewed the APWU's contentions stated in your cost comparison dated October 5 and discussions held in the October 12 meeting. The Postal Service has taken your cost comparisons into consideration and revised the PS Form 5505(s).
4. The revised Form 5505s purport to show a cost savings of approximately $\$ 24$ million dollars per year, which is significantly less than the approximately $\$ 87$ million savings claimed by the Postal Service in an earlier letter sent to me by Mr.

Devine on August 13, 2012. A true and correct copy of the earlier " 5505 Cost Evaluation - California Postal Vehicle Service vs. Highway Contract Service," which accompanied Mr. Devine's August 12, 2102 letter and purported to show a cost savings of approximately $\$ 87$ million, is attached hereto as Exhibit D.
5. As far as the APWU can verify, the only change the Postal Service made
to the revised Form 5505 s is to cure the double counting of truck costs (which the APWU previously pointed out). Previously the Postal Service had counted both the cost per hour and the cost per mile which were simply two ways of measuring the same cost. In the revised Form 5505s the Postal Service has eliminated this duplication by eliminating the cost calculated as cost per hour and keeping cost per mile.
6. The revised 5505 s still overstate cost differences between the PVS and Highway Contract Service ("HCR") contractors (that is, contracting out the work to private contractors) in the following ways:
6. a) The total number of hours worked by Postal Service employees is inflated by $3 \%$. The Postal Service adds $3 \%$ to the total number of hours worked by Postal Vehicle Service employees because Article 32, Section 2.E. 3 of the National Agreement requires that when calculating the cost for PVS employees to perform work, "[t]he Postal Vehicle Service will be charged 10 minutes at the start and 10 minutes at the end of each route, regardless of the vehicle used." But, to determine the number of hours actually worked by employees, the Postal Service uses Form 4533, which itself already adds an additional 10-15 minutes (the actual amount varies) before and after each route, thereby satisfying the "10 minutes" requirement of Article 32, Section 2.E.3. (A true and correct copy of Form 4533 is attached hereto as Exhibit E.) By adding an additional 3\%, the Postal Service is augmenting the apparent labor cost of PVS by 3\%, without justification.
6. b) Management costs are counted twice. The Postal Service should not include management costs as its own separate item of cost on the Form 5505 because management costs are already accounted for in the costs used to calculate the vehicle cost per mile. A true and correct copy of USPS Institutional Interrogatory Response APWU / USPS-35a in Postal Regulatory Commission Case No. N2012-1 (filed July 2, 2012) is
attached hereto as Exhibit F. This document shows that management costs are already included in the costs that are used to calculate vehicle costs.
6. c) The Postal Service's labor costs per hour are overstated because the Postal Service has neglected to factor in the number of lower-paid temporary employees, called Postal Support Employees ("PSEs") it employs as PVS drivers, when it determines labor costs. PSEs earn much less than either Level 7 motor vehicle operator or Level 8 tractor trailer operator, which are the rates of pay they use to calculate all labor costs on the Form 5505. The Postal Service is contractually entitled to employ PSEs to make up as much as $10 \%$ of its PVS workforce within each District. The National Agreement also allows the Union and Postal Service to negotiate a higher percentage of PSEs. The Postal Service currently employs approximately 69 PSE drivers in California which is approximately 8\% of the PVS workforce in California.
6. d) The Postal Service continues to use $\$ 999$ as the total administrative cost for each and every HCR contract in California. The Postal Service currently employs three Network Specialists in San Diego alone, who are responsible for administering HCR contracts. In San Francisco, the Postal Service employs 5 Network Specialists. Network Specialists serve as the intermediary between the HCR company and Postal Service management. They are responsible for resolving issues, conflicts, and additional service requirements; adjusting current HCR transportation to align with the changing transportation needs of the Postal Service; requesting additional trips for mail or equipment from the HCR contractor (and possibly for negotiating the rate of compensation for such additional trips or equipment); creating new contracts and monitoring the mail volume to determine if the HCR contract needs to be adjusted; and authorizing compensation adjustment for such items as fuel, tolls and mileage. The
omission of the cost of these Network Specialists from the cost of HCR contracts results in a substantial understatement of the cost of those contracts. In addition, the Postal Service must incur costs for employees who pay the HCR contractors, and who procure fuel and reconcile the fuel bills for those contractors. The Postal Service projects, for example, that the HCR contract for the Los Angeles Processing and Distribution Center will cost $\$ 13,981,033.06$. The Postal Service will incur very substantial costs in negotiating and administering that contract, but its Form 5505 for Los Angeles shows the administration cost as only $\$ 999$ per year. Such a low cost is simply not credible.
6. e) Most importantly, the APWU can only attempt to verify the numbers given for the cost of PVS. The Postal Service uses a Form 7463A to calculate the cost of HCR contracts. This form is prepared in two versions. One version is prepared by postal managers, using their best estimate of what the contract costs will be. The other version is prepared by the HCR contractor and submitted to the Postal Service, showing what the contractor estimates its cost will be. These forms are then used as a basis for the contract between the Postal Service and the contractor. Despite the importance of the information on these forms to the Union, the Postal Service has refused to provide copies of these forms or to provide the Union with this information in another format. The manner in which the Postal Service determines the cost of HCR contracts is not transparent, and therefore it is impossible to verify that a fair cost comparison is being conducted and that the Postal Service's claim as to the amount of money it will save, if any, is accurate.
7. Article 12, Section 5.B.1 of the National Agreement provides, "Excessing of APWU employees within the same Postal Area cannot occur more than once in any three (3) calendar month periods except by mutual agreement of the parties." All postal facilities in California are located in the Pacific area (which also includes Hawaii).

Employees in Anaheim P\&DF, Industry P\&DC, Long Beach P\&DC, San Francisco P\&DC and Santa Ana P\&DC have been informed that they will be excessed on November 17 2012. Pursuant to Article 12, Section 5.B.1, the earliest PVS employees at other PVS facilities in California can be excessed is February 17, 2013. Any claimed savings by the Postal Service February 17, 2013 should limited only to the facilities that are scheduled for excessing on the November 17, 2012.

I declare under penalty of perjury that the foregoing is true and correct.
Executed this 2nd day of November 2012, at Washington DC.


## EXHIBIT A

October 26, 2012

Robert C. Pritchard
Director, Motor Vehicle Services Division
American Postal Workers Union, AFL-CIO
1300 L Street, NW
Washington, DC 20005-4107

# Certified Mail Tracking Number: 70100290000371051424 

## Dear Bob:

On Friday, October 12, the Postal Service met with you to discuss the Postal Service's proposal to convert all of the Postal Vehicle Service (PVS) operating in the Pacific Area (excluding Hawaii), to Highway Contract Route (HCR) service. Subsequent to that meeting, the Postal Service reviewed the APWU's contentions stated in your cost comparison dated October 5 and discussions held in the October 12 meeting. The Postal Service has taken your cost comparisons into consideration and revised the PS Form 5505(s).

Per Article 32.2.D of the National Agreement, please see the enclosed revised copy of the Cost Evaluation - California Postal Vehicle Service vs. Highway Contract Service, and copies of PS Forms 5505.

In addition, in response to your letter dated October 4, indicating the Postal Service "...has not provided the APWU Article 32 information requested necessary to be in compliance," please be advised the Postal Service previously responded to this request in an email dated October 5, to you from Gwen Stembridge of my staff indicating this information is "...proprietary information... supplier's line item costs are not public information. It should also be noted the denial of request for similar information has been upheld by the NLRB (See Case 28-CA-21451) where the Administrative Judge ruled, '...I concur with the Respondent's argument that the Form should be protected against disclosure based on proprietary and confidentiality concems, which outweigh the Union's need for the information.'"

Please be advised the Postal Service stated in the October 12 meeting (and previous meetings held on Article 32) that due to proprietary information indicated on the PS Forms 7364a, this information will not be provided to the APWU. However, the Postal Service will supply a summary of the information on HCR costs for your review.

Please see enclosed for your review, a summary of HCR cost estimates (5505), with an explanation of how HCR costs are calculated.

[^0]If there are any questions, please contact Gwendolyn Stembridge of my staff at extension 5084.

Sincerely,


Patrick M. Devine
Manager
Contract Administration (APWU)
Enclosure
bcc: Mr. Tulino
Mr. Devine
Mr. Alexandrovich
Mr. Cavallo
Ms. Perron
Mr. Dufek
Mis. Hércules
Ms. Ledbetter
Mr. Mlakar
Mr. Mohl
Mr. Moore
Ms. Stevenson
Ms. Adona
Mr. Berrang
Mr. Coffey
Mr. Dean
Mr. LeFevre
Mr. Pluguez
Ms. Randolph
Ms. Stembridge
Mr. Brill

File: PVS Conversion, Pacific Area-Article 32, Revised 5505 Reading (Stembridge)

Z:ISTAFF FOLDERSIStembridgelMotor VehicleVArticle 32 20121Pacific Area REVISED 5505s 10.2012.doc

## EXHIBIT B

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COST EVALUATION - POSTAL VEHICLE SERVICE VS. CONTRACT SERVICE



| Postal Service Overhead Cost |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: |
| 27. Management Cost per hour | $\begin{array}{\|r\|} \hline \text { Hours (line } 16) \\ 6376.9 \\ \hline \end{array}$ | \$14,348.11 | 28. Total Postal Vehicle Service Costs (lines $26+27$ ) | \$488,119.66 |
| Contract Service Cost |  |  |  |  |
| 29. Annual Contract Operation Cost | Estimat |  | Annual Rate of HCR | \$352,031.49 |


| Cost Comparison |  |  |  |
| :--- | :---: | :---: | :---: |
| 30. Annual Contract Management Cost | $\$ 999.00$ | 31. Total Annual Cost of Contract <br> Operation (lines 29+30) | $\$ \mathbf{\$ 3 5 3 , 0 3 0 . 4 9}$ |


| Recommendation By General Manager/Postmaster District |  |  |  |  |
| :--- | :--- | :--- | :--- | :--- |
|  | Postal Vehicle Service | Signature | Date |  |
|  |  |  |  |  |



PS Form 5505 (March, 1992) (facsimile) - last update 3/20/07


Area Choice (Top of Sheet

Northeast
East
West
South
Central

U.S. Postal Service

COST EVALUATION - POSTAL VEHICLE SERVICE VS. CONTRACT SERVICE

| 1. Route No. Part B | 2. Type of Route PVS | 3. Annual Miles $\begin{aligned} \\ 221,573.1\end{aligned}$ | 4. Annual Estimated Schedule Hours $24,267.25$ | 5. |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
| 6. Origin Terminus: 7. Destination Terminus: <br>   <br> VARIOUS  |  | 7. Destination Terminus: <br> VARIOUS |  |  |  |


| 8. Number of Vehicles Needed |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Truck, less than $300 \mathrm{cu} . \mathrm{ft}$ | $\begin{gathered} 300 \text { to } 600 \\ \text { cu. ft. } \end{gathered}$ | $\begin{aligned} & 600 \text { to } 900 \\ & \text { cu.f. } \end{aligned}$ | Van over <br> 900 cu. ft <br> 9 | Tractor | Trailers (Length) |  |  |  |  |  |
|  |  |  |  |  | Feet | Feet | Feet | Feet | Feet | Feet |
| 9. Craft of Postal employee: <br> X MVS Operator |  | ier $\quad$ Other |  |  | 10. Usual level of employee assigned:Motor Vehicle Operator LVL-07 |  |  |  |  |  |



| Postal Service Overhead Cost |  |  |  |  |  |  |  |
| :--- | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 27. Management Cost per hour | Hours (line 16) <br> 24995.3 | $\$ 56,239.35$ | 28. Total Postal Vehicle Service Costs <br> (lines $26+27$ ) | $\mathbf{\$ 1 , 5 4 1 , 4 1 5 . 9 6}$ |  |  |  |


| Contract Service Cost |  |  |  |
| :---: | :---: | :---: | :---: |
| ${ }^{\text {9, Annual Contract Operation Cost }}$ | Estimated Rate | Anाuarkate of HCR | \$1,113,274.04 |


| Cost Comparison |  |  |  |
| :--- | :--- | :--- | :--- |
| 30. Annual Contract Management Cost | 31. Total Annual Cost of Contract |  |  |



| Prepared by: (PRINT NAME) | Reviewed by: (PRINT NAME) |
| :--- | :--- | :--- |
| 34. Signature and Date | CONTRACT TRANSPORTATION SPECIALIST MANAGER, TRANSPORTATION CONTRACTS |
|  | Signature and Date |

PS Form 5505 (March, 1992) (facsimile) - last update 3/20/07

## Input data from HQ's Quarterly Cost Data into the yellow boxes below.

## Box 17

City Carrier
Motor Vehicle Operator
Tractor Trailer Operator

Box 20
Intermediate
Cargo Van
Tractor (SA)
Spotter (SP)
Tractor (TA)


Box 21
Intermediate
Cargo Van
Tractor (SA)
Spotter (SP)
Tractor (TA)


Box 22

| Trailer Cost |  |  |
| :---: | :---: | :---: |
| NY Metro | NY Metro | $\$ 1,288.00$ |
| NE | NE | $\$ 2,097.00$ |
| EA | EA | $\$ 1,634.00$ |
| CapMet | CapMet | $\$ 1,098.00$ |
| West | West | $\$ 1,125.00$ |
| PAC | PAC | $\$ 1,149.00$ |
| SW | SW | $\$ 2,393.00$ |

Case4:12-cv-05327-YGR Document40-2 Filed11/02/12 Page5 of 19 U.S. Postal Service

COST EVALUATION - POSTAL VEHICLE SERVICE VS. CONTRACT SERVICE

| 1. Route No. | 2. Type of Route | 3. Annual Miles | 4. Annual Estimated Schedule Hours |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
| Part A | PVS | 73,168.1 | 3,075.14 |  |  |
| 6. Origin Terminus: $\quad$ 7. Destination Terminus: |  |  |  |  |  |
| INDUSTRY P\&DC VARIOUS |  |  |  |  |  |


| 8. Number of Vehicles Needed |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Truck, less <br> than $300 \mathrm{cu} . \mathrm{ft}$. | $\begin{aligned} & 30010600 \\ & \text { cu.f. } \end{aligned}$ | $\begin{aligned} & 60010900 \\ & \text { cut. } 0 \text { an } \end{aligned}$ | Van over $900 \mathrm{cu} . \mathrm{ft}$ | $\begin{aligned} & \text { Tractor } \\ & 2 \end{aligned}$ | Trailers (Length) |  |  |  |  |  |
|  |  |  |  |  | eet | Feet | Feet | Feet | Feet | Feet |
|  |  |  |  |  | 3--53' |  |  |  |  |  |
| 9. Craft of Postal employee:x MVS Operator |  | Carrier |  | Other | 10. Usual level of employee assigned |  |  | 43.94 |  |  |
|  |  |  |  |  |  |  |  |  |  |




## Cost Comparison

| 30. Annual Contract Management Cost | $\$ 999.00$ | 31. Total Annual Cost of Contract <br> Operation (lines $29+30)$ | $\$ 197,128.93$ |
| :--- | :---: | :---: | :---: |


| Recommendation By General Manager/Postmaster District |  |  |  |
| :--- | :--- | :--- | :--- |
| 32. | Postal Vehicle Service $^{3}$ | Signature | Date |
|  | Contract |  |  |



PS Form 5505 (March, 1992) (facsimile) - last update 3/20/07

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Northeast
East
West
South
Central


East
West
South
Central

West

## U.S. Postal Service

COST EVALUATION - POSTAL VEHICLE SERVICE VS. CONTRACT SERVICE

| $\begin{aligned} & \text { 1. Route No. } \\ & \text { Part B } \\ & \hline \end{aligned}$ | 2. Type of Route $\qquad$ | $222,678.6$ | 4. Annual Estimated Schedule Hours $14,830.44$ | 5. | Existing Contract |
| :---: | :---: | :---: | :---: | :---: | :---: |
| 6. Origin Terminus: ${ }^{\text {7. Destina }}$ |  |  |  |  | Existing P V.S. |
|  | INDUSTR |  | VARIOUS |  | Proposed Service |


| 8. Number of Vehicles Needed |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Truck, less$\text { than } 300 \mathrm{cu} . \mathrm{ft}$ | $\begin{gathered} 300 \text { to } 600 \\ \text { cu ft. } \end{gathered}$ | $\begin{gathered} 600 \text { to } 900 \\ \text { cu.ft } \end{gathered}$ | Van over | Tractor |  |  |  | (Leng |  |  |
|  |  |  | $\begin{gathered} 900 \text { cu. ft. } \\ 10 \end{gathered}$ |  | Feet | Feet | Feet | Feet | Feet | Feet |
| 9. Craft of Postal employee: |  | Carrier |  |  | 10. Usual level of employee assigned: |  |  |  |  |  |



| Postal Service Overhead Cost |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 27. Management Cost per hour | Hours (line 16) <br> 15275.4 | 28. Total Postal Vehicle Service Costs <br> (lines $26+27$ ) | $\mathbf{\$ 3 4 , 3 6 9 . 5 4}$ |  |  |  |


| Contract Service Cost |  |  |  |
| :---: | :---: | :---: | :---: |
| ${ }^{\circ} 9$, Annual Contract Operation Cost | Estimated Rate | Antrual रate of HCB | \$787,526.26 |

## Cost Comparison

30. Annual Contract Management Cost
31. Total Annual Cost of Contract

Recommendation By General Manager / Postmaster District

| Recommendation By General Manager/Postmaster District |  |  |  |  |  |  |  |  |  |
| :--- | :--- | :--- | :--- | :---: | :---: | :---: | :---: | :---: | :---: |
| 32. | Postal Vehicle Service | Signature | Date |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |

Recommendation By Manager, Transportation Purchasing, DNO

| Recommendation By Manager, Transportation Purchasing, DNO |  |  |  |  |  |  |  |  |
| :--- | :--- | :--- | :--- | :--- | :---: | :---: | :---: | :---: |
| 33. | Postal Vehicle Service | Signature | Date |  |  |  |  |  |
|  | $\square$ Contract |  |  |  |  |  |  |  |


| Prepared by: (PRINT NAME) | Reviewed by: (PRINT NAME) |
| :--- | :--- |
| 34. Signature and Date | CONTRACT TRANSPORTATION SPECIALIST MANAGER, TRANSPORTATION CONTRACTS |

PS Form 5505 (March, 1992) (facsimile) - last update 3/20/07

## Input data from HQ's Quarterly Cost Data into the yellow boxes below.

Box 17
City Carrier
Motor Vehicle Operator
Tractor Trailer Operator


Box 20



Box 22
Trailer Cost
NY Metro
NE
EA
CapMet
West
PAC

|  |  |
| :---: | :--- |
| NY Metro | $\$ 1,288.00$ |
| NE | $\$ 2,097.00$ |
| EA | $\$ 1,635.00$ |
| CapMet | $\$ 1,098.00$ |
| West | $\$ 1,125.00$ |
| PAC | $\$ 1,149.00$ |
| SW | $\$ 2,393.00$ |

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COST EVALUATION - POSTAL VEHICLE SERVICE VS. CONTRACT SERVICE


| Postal Service Overhead Cost |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: |
| 27. Management Cost per hour | $\begin{array}{\|r} \hline \text { Hours (line 16) } \\ 6821.0 \\ \hline \end{array}$ | \$15,347.27 | 28. Total Postal Vehicle Service Costs <br> (lines $26+27$ ) | \$444,215.47 |
| Contract Service Cost |  |  |  |  |
| 29. Annual Contract Operation Cost | Estima |  | Annual Rate of HCR | \$327,860.53 |
| Cost Comparison |  |  |  |  |
| 30. Annual Contract Management Cost |  | \$999.00 | 31. Total Annual Cost of Contract Operation (lines $29+30$ ) | \$328,859.53 |


| Recommendation By General Manager/Postmaster District |  |  |  |
| :--- | :--- | :--- | :--- | :--- |
| 32. | Postal Vehicle Service | Signature | Date |
|  | $\square$ |  |  |


| Recommendation By Manager, Transportation Purchasing, DNO |  |  |  |  |  |  |  |  |
| :--- | :--- | :--- | :--- | :--- | :---: | :---: | :---: | :---: |
| 33. | Postal Vehicle Service | Signature | Date |  |  |  |  |  |
|  | $\square$ |  |  |  |  |  |  |  |


| Prepared by: (PRINT NAME) |  | \|Reviewed by: (PRINT NAME) |
| :---: | :---: | :---: |
|  | CONTRACT TRANSPORTATION SPECIALI | IST MANAGER, TRANSPORTATION CONTRACTS |
| 1. Signature and Date |  | Signature and Date |

PS Form 5505 (March, 1992) (facsimile) - last update 3/20/07

Area Choice (Top of Sheet

Northeast
East
West
South
Central

Northeast
East
West
South
Central

West

## U.S. Postal Service

COST EVALUATION - POSTAL VEHICLE SERVICE VS. CONTRACT SERVICE



| Postal Service Overhead Cost |  |  |  |  |  |
| :--- | :---: | :---: | :---: | :---: | :---: |
| 27. Management Cost per hour | Hours (line 16) <br> 12419.6 | $\$ 27,944.16$ | 28. Total Postal Vehicle Service Costs <br> (lines $26+27$ ) | $\mathbf{\$ 7 9 7 , 1 5 2 . 4 2}$ |  |


| Contract Service Cost |  |  |  |
| :---: | :---: | :---: | :---: |
| ${ }^{\text {og. Annual Contract Operation Cost }}$ | Estimated Rate | ATInuar kate | \$578,252.45 |


| Cost Comparison |  |  |  |
| :--- | :--- | :--- | :--- |
| 30. Annual Contract Management Cost | 31. Total Annual Cost of Contract |  |  |

Recommendation By General Manager / Postmaster District

| Recommendation By General Manager/Postmaster District |  |  |  |  |  |  |  |  |
| :--- | :--- | :--- | :--- | :--- | :---: | :---: | :---: | :---: |
| 32. | Postal Vehicle Service | Signature | Date |  |  |  |  |  |
|  | $\square$ Contract |  |  |  |  |  |  |  |

Recommendation By Manager, Transportation Purchasing, DNO

| Recommendation By Manager, Transportation Purchasing, DNO |  |  |  |  |  |  |  |
| :--- | :--- | :--- | :--- | :--- | :---: | :---: | :---: |
| 33. | $\square$ | Postal Vehicle Service | Signature | Date |  |  |  |
|  | $\square$ |  |  |  |  |  |  |


| Prepared by: (PRINT NAME) | Reviewed by: (PRINT NAME) |
| :--- | :--- |
| 34. Signature and Date | CONTRACT TRANSPORTATION SPECIALIST MANAGER, TRANSPORTATION CONTRACTS |
|  |  |

PS Form 5505 (March, 1992) (facsimile) - last update 3/20/07

## Input data from HQ's Quarterly Cost Data into the yellow boxes below.

Box 17
City Carrier
Motor Vehicle Operator
Box 20
Intermediate
Cargo Van
Tractor (SA)
Spotter (SP)
Tractor (TA)


Box 22
Trailer Cost
NY Metro
NE
EA
CapMet
West
PAC
SW

|  |  |
| :---: | :--- |
| NYMetro | $\$ 1,288.00$ |
| NE | $\$ 2,097.00$ |
| EA | $\$ 1,634.00$ |
| CapMet | $\$ 1,098.00$ |
| West | $\$ 1,125.00$ |
| PAC | $\$ 1,149.00$ |
| SW | $\$ 2,293.00$ |

Case4:12-cv-05327-YGR $\begin{gathered}\text { Document40-2 } \\ \text { U.S. Postal Service }\end{gathered}$ Filed11/02/12 Page11 of 19
COST EVALUATION - POSTAL VEHICLE SERVICE VS. CONTRACT SERVICE

| 1. Route No. | 2. Type of Route | 3. Annual Miles | 4. Annual Estimated Schedule Hours | 5. |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
| Part A | PVS | 359,610.6 | 22,715.63 |  |  |
| h Terminus: $\quad$ 7. Destination Terminus: |  |  |  |  |  |
| SANTA ANA P\&DC VARIOUS |  |  |  |  |  |




| Recommendation By General Manager/Postmaster District |  |  |  |
| :--- | :--- | :--- | :--- |
| 32. | Postal Vehicle Service | Signature | Date |
|  | $\square$ |  |  |

Recommendation By Manager, Transportation Purchasing, DNO

| Recommendation By Manager, Transportation Purchasing, DNO |  |  |  |
| :--- | :--- | :--- | :--- | :--- |
|  | Postal Vehicle Service | Signature | Date |
|  | $\square$ |  |  |


| Prepared by: (PRINT NAME) |  | Reviewed by: (PRINT NAME) |
| :---: | :---: | :---: |
|  | CONTRACT TRANSPORTATION SPECIALIS | IST MANAGER, TRANSPORTATION CONTRACTS |
| 7. Signature and Date |  | Signature and Date |

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Document40-2


Area Choice (Top of Sheet

U.S. Postal Service

COST EVALUATION - POSTAL VEHICLE SERVICE VS. CONTRACT SERVICE

| $\begin{aligned} & \text { 1. Route No. } \\ & \text { Part B } \\ & \hline \end{aligned}$ | 2. Type of Route $\qquad$ | 3. Annual Miles $295,501.9$ | 4. Annual Estimated Schedule Hours 22,986.62 | 5. | Existing Contract |
| :---: | :---: | :---: | :---: | :---: | :---: |
| 6. Origin Terminus: ${ }^{\text {SANTA ANA P\&DC }}$, ${ }^{\text {7. Destination Terminus: }}$ VARIOUS |  |  |  |  | Existing P. V |
|  | SANTA AN |  | VARIOUS |  | Proposed Service |


| 8. Number of Vehicles Needed |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Truck, less | 300 to 600 | 600 to 900 | Van over | Tractor |  |  |  | (Leng |  |  |
| than $300 \mathrm{cu} . \mathrm{ft}$. | cu.ft. | cu. ft. | $\begin{gathered} 900 \text { cu. ft. } \\ 16 \end{gathered}$ |  | Feet | Feet | Feet | Feet | Feet | Feet |
| 9. Craft of Postal employee: <br> X MVS Operator |  | Other |  |  | 10. Usual level of employee assigned: <br> Motor Vehicle Operator LVL-07 |  |  |  |  |  |



| Postal Service Overhead Cost |  |  |  |  |  |
| :--- | :---: | :---: | :---: | :---: | :---: |
| 27. Management Cost per hour | Hours (line 16) <br> 23676.2 | $\$ 53,271.49$ | 28. Total Postal Vehicle Service Costs <br> (lines $26+27$ ) | $\mathbf{\$ 1 , 6 0 5 , 8 4 0 . 1 5}$ |  |


| Contract Service Cost |  |  |  |
| :---: | :---: | :---: | :---: |
| ${ }^{9} 9$. Annual Contract Operation Cost | Estimated Rate | Aाnlual of $H C B$ | \$1,161,043.34 |
| Cost Comparison |  |  |  |
| 30. Annual Contract Management Cost |  | 31. Total Annual Cost of Contract |  |

Recommendation By General Manager / Postmaster District

| Recommendation By General Manager / Postmaster District |  |  |  |  |  |  |  |
| :--- | :--- | :--- | :--- | :--- | :---: | :---: | :---: |
| 32. | Postal Vehicle Service | Signature | Date |  |  |  |  |
|  | $\square$ Contract |  |  |  |  |  |  |

Recommendation By Manager, Transportation Purchasing, DNO

| Recommendation By Manager, Transportation Purchasing, DNO |  |  |  |  |
| :--- | :--- | :--- | :--- | :--- |
| 33. | Postal Vehicle Service | Signature | Date |  |
|  | $\square$ |  |  |  |


| Prepared by: (PRINT NAME) | Reviewed by: (PRINT NAME) |
| :--- | :--- | :--- |
| 34. Signature and Date | CONTRACT TRANSPORTATION SPECIALIST MANAGER, TRANSPORTATION CONTRACTS |
|  | Signature and Date |

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## Input data from HQ's Quarterly Cost Data into the yellow boxes below.



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COST EVALUATION - POSTAL VEHICLE SERVICE VS. CONTRACT SERVICE



| Postal Service Overhead Cost |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: |
| 27. Management Cost per hour | $\begin{array}{r} \text { Hours (line 16) } \\ 69222.2 \\ \hline \end{array}$ | \$155,749.91 | 28. Total Postal Vehicle Service Costs (lines $26+27$ ) | \$3,324,865.33 |
| Contract Service Cost |  |  |  |  |
| 29. Annual Contract Operation Cost | Estimate |  | Annual Rate of HCR | \$2,400,293.65 |


| Cost Comparison |  |  |  |  |
| :--- | :---: | :---: | :---: | :---: |
| 30. Annual Contract Management Cost | $\$ 999.00$ | 31. Total Annual Cost of Contract <br> Operation (lines $29+30$ ) | $\$ \mathbf{\$ 2 , 4 0 1 , 2 9 2 . 6 5}$ |  |


| Recommendation By General Manager/Postmaster District |  |  |  |  |  |  |  |
| :--- | :--- | :--- | :--- | :--- | :---: | :---: | :---: |
| 32. |  | Postal Vehicle Service | Signature | Date |  |  |  |
|  | $\square$ | Contract |  |  |  |  |  |



| Prepared by: (PRINT NAME) | Reviewed by: (PRINT NAME) |
| :--- | :--- | :--- |
| 4. Signature and Date |  |

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COST EVALUATION - POSTAL VEHICLE SERVICE VS. CONTRACT SERVICE

| 1. Route No. | 2. Type of Route | 3. Annual Miles | 4. Annual Estimated Schedule Hours |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
| Part A | PVS | 1,182,968.3 | 182,861.19 |  |  |
| 6. Origin Terminus: ${ }^{\text {7. Destination Terminus: }}$ |  | - $\left.\right\|^{7 . \text { Destination Terminus: }}$ VARIOUS |  |  |  |
| LOS ANGELES PDC VARIOUS |  |  |  |  |  |




| Postal Service Overhead Cost |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: |
| 27. Management Cost per hour | $\begin{array}{\|r\|} \hline \text { Hours (line 16) } \\ 188347.0 \\ \hline \end{array}$ | \$423,780.81 | 28. Total Postal Vehicle Service Costs (iines $26+27$ ) | \$10,878,569.77 |
| Contract Service Cost |  |  |  |  |
| 29. Annual Contract Operation Cost | Estimated |  | Annual Rate of HCR | \$7,851,999.70 |
| Cost Comparison |  |  |  |  |
| 30. Annual Contract Management Cost |  | \$999.00 | 31. Total Annual Cost of Contract Operation (lines $29+30$ ) | \$7,852,998.70 |



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Area Choice (Top of Sheet

Northeast
East
West
South
Central


## U.S. Postal Service

COST EVALUATION - POSTAL VEHICLE SERVICE VS. CONTRACT SERVICE


| 8. Number of Vehicles Needed |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Truck, less | 300 to 600 | 600 to 900 | Van over | Tractor |  |  |  | (Leng |  |  |
| than $300 \mathrm{cu} . \mathrm{ft}$. | cu. ft. | cu.f. | 900 cu. ft. 50 |  | Feet | Feet | Feet | Feot | Feet | Feet |
| 9. Craft of Postal employee: <br> X MVS Operator |  | Carrier |  | ther | 10. Usual level of employee assigned <br> Motor Vehicle Operator LVL-07 |  |  |  |  |  |



| Postal Service Overhead Cost |  |  |  |  |  |
| :--- | :---: | :---: | :---: | :---: | :---: |
| 27. Management Cost per hour | Hours (line 16) <br> 154102.1 | $\$ 346,729.80$ | 28. Total Postal Vehicle Service Costs <br> (lines 26 + 27) | $\mathbf{\$ 8 , 6 5 4 , 6 4 2 . 1 5}$ |  |


| Contract Service Cost |  |  |  |
| :---: | :---: | :---: | :---: |
| ${ }^{\text {9, }}$ Annual Contract Operation Cost | Estimated Rate | Anापuarkate | \$6,127,035.36 |
| Cost Comparison |  |  |  |
| 30. Annual Contract Management Cost |  | 31. Total Annual Cost of Contract |  |

Recommendation By General Manager / Postmaster District

| Recommendation By General Manager/Postmaster District |  |  |  |  |  |  |
| :--- | :--- | :--- | :--- | :--- | :---: | :---: |
| 32. | $\square$ Postal Vehicle Service | Signature | Date |  |  |  |
|  | $\square$ Contract |  |  |  |  |  |

Recommendation By Manager, Transportation Purchasing, DNO

| Recommendation By Manager, Transportation Purchasing, DNO   <br> 33. Postal Vehicle Service Signature |  |  |  |  |
| :--- | :--- | :--- | :--- | :--- |
|  | $\square$ |  | Date |  |


| Prepared by: (PRINT NAME) | Reviewed by: (PRINT NAME) |
| :--- | :--- | :--- |
| 34. Signature and Date | CONTRACT TRANSPORTATION SPECIALIST MANAGER, TRANSPORTATION CONTRACTS |
|  | Signature and Date |

PS Form 5505 (March, 1992) (facsimile) - last update 3/20/07

## Input data from HQ's Quarterly Cost Data into the yellow boxes below.

Box 17
City Carrier
Motor Vehicle Operator

|  |  |
| :---: | ---: |
| City Carrier LVL-07 | $\$ 38.29$ |
| Motor Vehicle Operator LVL-07 | $\$ 43.36$ |
| Tractor Trailer Opertor LVL-08 | $\$ 43.94$ |

Box 20
Intermediate
Cargo Van
Tractor (SA)
Spotter (SP)
Tractor (TA)

\section*{$\begin{array}{cc} & \\ & \text { INT } \\ & \text { VAN } \\ & \text { SAT } \\ & \text { SP } \\ & \text { TT }\end{array}$ <br> $\left[\begin{array}{l}\$ 1.35 \\ \$ 1.48 \\ \$ 1.23 \\ \$ 3.73 \\ \$ 1.41\end{array}\right.$ <br> |  |  |
| :---: | :---: |
| INT |  |
| VAN | $\$ 8.79$ |
| SAT | $\$ 0.00$ |
| SP | $\$ 12.78$ |
|  | $\$ 1$ |
| 3 |  |
|  | $\$ 14.17$ |}

Box 21
Intermediate
Cargo Van
Tractor (SA)
Spotter (SP)
Tractor (TA)

Box 22
Trailer Cost NY Metro
NE
EA
CapMet
West
PAC
NYMetro
NE
EA
CapMet
West
PAC
SW


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COST EVALUATION - POSTAL VEHICLE SERVICE VS. CONTRACT SERVICE

| 1. Route No. Part A | 2. Type of Rc | VS | 1,228,550.7 |  |  | $60,084.78$ |  |  | 5. | Existing Contract <br> Existing P.V.S. <br> Proposed Service |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 6. Origin Terminus: <br> MARGARET SELLERS |  |  |  |  | 7. Destination Terminus: |  |  |  |  |  |
| 8. Number of Vehicles Needed |  |  |  |  |  |  |  |  |  |  |
| $\begin{aligned} & \text { Truck, less } \\ & \text { than } 300 \mathrm{cu} . \mathrm{ft} . \end{aligned}$ | $\begin{gathered} 300 \text { to } 600 \\ \text { cu. ft. } \end{gathered}$ | $\begin{aligned} & 600 \text { to } 900 \\ & \text { cu.ft. } \end{aligned}$ | Van over $900 \mathrm{cu} . \mathrm{ft}$. | Tractor$28$ | Trailers (Length) |  |  |  |  |  |
|  |  |  |  |  | Feet | Feet | Feet | Feet | Feet | Feet |
|  |  |  |  |  | 7-28 | 13--38 | 4-39' | 40-45' | $2-48^{\prime}$ | $2-53^{\prime}$ |
|  |  | Carrier |  |  | 10. Usual level of employee assigned: <br> Tractor Trailer Opertor LVL-08 $43.94$ |  |  |  |  |  |



| Postal Service Overhead Cost |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: |
| 27. Management Cost per hour | $\begin{array}{\|r\|} \hline \text { Hours (line } 16 \text { ) } \\ 61887.3 \\ \hline \end{array}$ | \$139,246.48 | 28. Total Postal Vehicle Service Costs (lines $26+27$ ) | \$4,927,930.95 |
| Contract Service Cost |  |  |  |  |
| 29. Annual Contract Operation Cost | Estimated Rate |  | Annual Rate of HCR | \$3,414,061.39 |
| Cost Comparison |  |  |  |  |
| 30. Annual Contract Management Cost |  | \$999.00 | 31. Total Annual Cost of Contract Operation (lines $29+30$ ) | \$3,415,060.39 |


| Recommendation By General Manager/Postmaster District |  |  |  |
| :--- | :--- | :--- | :--- | :--- |
| 32. | Postal Vehicle Service | Signature | Date |
|  | Contract |  |  |


| Recommendation By Manager, Transportation Purchasing, DNO |  |  |  |  |  |  |  |  |
| :--- | :--- | :--- | :--- | :--- | :---: | :---: | :---: | :---: |
| 33. | Postal Vehicle Service | Signature | Date |  |  |  |  |  |
|  | $\square$ |  |  |  |  |  |  |  |


| Prepared by: (PRINT NAME) |  | Reviewed by: (PRINT NAME) |
| :---: | :---: | :---: |
|  | CONTRACT TRANSPORTATION SPECIALIS | IST MANAGER, TRANSPORTATION CONTRACTS |
| Signature and Date |  | \|Signature and Date |

PS Form 5505 (March, 1992) (facsimile) - last update 3/20/07

| Recommendation By General Manager/Postmaster District |  |  |  |  |
| :--- | :--- | :--- | :--- | :--- |
| 32. | $\square$ | Postal Vehicle Service | Signature | Date |
|  | $\square$ |  |  |  |

Recommendation By Manager, Transportation Purchasing, DNO

| Recommendation By Manager, Transportation Purchasing, DNO |  |  |  |  |
| :--- | :--- | :--- | :--- | :--- |
| 33. | Postal Vehicle Service | Signature | Date |  |
|  | $\square$ |  |  |  |


| Prepared by: (PRINT NAME) | Reviewed by: (PRINT NAME) |  |
| :--- | :--- | :--- |
| 34. Signature and Date | CONTRACT TRANSPORTATION SPECIALIST MANAGER, TRANSPORTATION CONTRACTS |  |
|  |  | Signature and Date |

PS Form 5505 (March, 1992) (facsimile) - last update 3/20/07

## Input data from HQ's Quarterly Cost Data into the yellow boxes below.

Box 17
City Carrier
Motor Vehicle Operator
Tractor Trailer Operator

Box 20
Intermediate
Cargo Van
Tractor (SA)
Spotter (SP)
Tractor (TA)

Box 21
Intermediate
Cargo Van
Tractor (SA)
Spotter (SP)
Tractor (TA)

## Box 22

Trailer Cost
NY Metro
NE
EA
CapMet
West
PAC
SW


## EXHIBIT C

## HCR Cost Estimates

All costs are calculated based upon the following factors to create a standardized price for HCR costs

## Operating Cost

Motor Vehicles costs as a cluster average of local contracts x annual miles Operational Cost as a cluster average of local contracts x Annual Miles
Vehicle Registration as a general state DMV average x No of vehicles
General Overhead as a cluster average of local contracts. An additional $\$ 0.10$ per mile has been added to allow for the additional supplier overhead cost.

Fuel is the DOE Regional PPG average of June 2012. Average MPG used is 6 MPG (TT) and 8 MPG (SB)).
Oil as an average of 300 miles per quart ( $\$ 4$ per qt)
Insuranace cost as a cluster average of local contracts
Labor Cost
Straight time based upon the WD as of June $2012 \times$ Annual Hours
Payroll taxes based upon the following average factors
Soc Sec - Federal factor, WC (0.1200), Fed Ump (0.006) and State Rate
Fringe Benefits based upon WD as of June 2012; 2 week vacation and 10 holidays
Contractor Cost
Contractor Costs calculated at 5\% of labor cost to allow for supplier infrastructure such as on-site oversight

[^1]HCR COST ESTIMATES - 5505

|  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| WD |  |  | Facility | Miles | ours | fuel | era | Labor | Cont Ove | tal wifuel |
| 1977-0194-57 | SB | 6 | Anaheim, CA P\&DF | 130,380.30 | 12,057.90 | \$65,630.18 | \$159,465.14 | \$398,845.05 | \$19,942.25 | \$578,252.45 |
| 1977-0194-57 | $\pi$ | 2 | Anaheim, CA P\&DF | 83,179.90 | 6,622.30 | \$55,827.58 | \$94.548.36 | \$222,202.07 | \$11,110.10 | \$327,860.53 |
| 1977-0194-57 | Total | 8 | Anaheim, CA P\&DF | 213,560.20 | 18,680.20 | \$121,457.76 | \$254,013.50 | \$621,047.13 | \$31,052.36 | \$906,112.98 |
| 1977-0194-57 | SB | 10 | Industry, CA P\&DC | 222,678.60 | 14,830.40 | \$112,090.84 | \$272,241.70 | \$490,747.20 | \$24,537.36 | \$787,526.26 |
| 1977-0194-57 | $\pi$ | 2 | Industry, CA P\&DC | 73,168.10 | 3,075.10 | \$49,107.99 | \$83,457.08 | \$107,307.48 | \$5,365.37 | \$196,129.93 |
| 1977-0194-57 | Total | 12 | Industry, CA P\&DC | 295,846.70 | 17,905.50 | \$161,198.83 | \$355,698.78 | \$598,054.68 | \$29,902.73 | \$983,656.19 |
| 1977-0194-57 | SB | 9 | Long Beach, CA P\&DC | 221,573.10 | 24,267.30 | \$111,534.36 | \$270,462.48 | \$802,677,68 | \$40,133.88 | \$1,113,274.04 |
| 1977-0194-57 | TT | 2 | Long Beach, CA P\&DC | 118,928.50 | 6,191.20 | \$79,820.84 | \$134,151.37 | \$207,504.87 | \$10,375.24 | \$352,031.49 |
| 1977-0194-57 | Total | 11 | Long Beach, CA P\&DC | 340,501.60 | 30,458.50 | \$191,355.20 | \$404,613.85 | \$1,010,182.55 | \$50,509.13 | \$1,465,305.53 |
| 1977-0194-57 | SB | 16 | Santa Anna, CAP\&DC | 295,501.90 | 22,986.60 | \$148,748.27 | \$362,502.13 | \$760,515.44 | \$38,025.77 | \$1,161,043.34 |
| 1977-0194-57 | $\pi$ | 9 | Santa Anna, CAP\&DC | 359,610.60 | 22,715.60 | \$241,358.65 | \$409,183.81 | \$760,962.09 | \$38,048.10 | \$1,208,194.01 |
| 1977-0194-57 | Total | 25 | Santa Anna. CAP\&DC | 655,112.50 | 45,702.20 | \$390,106.92 | \$771,685.94 | \$1,521,477.53 | \$76,073.88 | \$2,369,237,35 |
| 1977-0194-57 | SB | 0 | Los Angeles, CA NDC |  |  | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| 1977-0194-57 | Spotters | 13 | Los Angeles, CA NDC | 16,801.50 | 67,206.00 | \$11,276.61 | \$35,043.20 | \$2,252,619.48 | \$112,630.97 | \$2,400,293.65 |
| 1977-0194-57 | Total | 13 | Los Angeles, CA NDC | 16,801.50 | 67,206.00 | \$11,276.61 | \$35,043.20 | \$2,252,619.48 | \$112,630.97 | \$2,400,293.65 |
| 1977-0194-57 | SB | 48 | Los Angeles, CA P\&DC | 967,883.30 | 149,613.72 | \$487,208.26 | \$931,553.87 | \$4,948,077.61 | \$247,403.88 | \$6,127,035.36 |
| 1977-0194-57 | TT | 40 | Los Angeles, CA P\&DC | 1,182,968.30 | 182,861.19 | \$793,968.89 | \$1,416,966.41 | \$6,128,603.20 | \$306,430.16 | \$7,851,999.77 |
| 1977-0194-57 | Total | 88 | Los Angeles, CA P\&DC | 2,150,851.60 | 332,474.91 | \$1,281,177.15 | \$2,348,520.28 | \$11,076,680.81 | \$553,834.04 | \$13,979,035.13 |
| 1977-0194-57 | SB | 30 | M Sellers, CA P\&DC | 781,553.90 | 44,195.30 | \$393,414.69 | \$818,499.21 | \$1,398,945,39 | \$69,947.27 | \$2,287,391.87 |
| 1977-0194-57 | T1 | 25 | M Sellers, CA P\&DC | 1,228,550.70 | 60,084.80 | \$824,562.28 | \$1,363,763,78 | \$1,952,664.39 | \$97,633.22 | \$3,414,061.39 |
| 1977-0194-57 | Total | 55 | M Sellers, CA P\&DC | 2.010,104.60 | 104,280.10 | \$1,217,976.97 | \$2,182,263.00 | \$3,351,609.78 | \$167,580.49 | \$5,701,453.26 |
| 1977-0194-57 | SB | 30 | Oakland, CA P\&DC | 641,025.20 | 50,792.40 | \$322,676.06 | \$634,242.09 | \$1,690,938.09 | \$84,546.90 | \$2,409,727.09 |
| 1977-0194-57 | $\pi$ | 26 | Oakland, CA P\&DC | 1,181,464.30 | 97,474.30 | \$792,959.46 | \$1,397.492.58 | \$3,297,208.74 | \$164,860.44 | \$4,859,561.75 |
| 1977-0194-57 | Total | 56 | Oakland, CA P\&DC | 1,822,489.50 | 148,266.70 | \$1,115,635.52 | \$2,031,734.67 | \$4,988,146.83 | \$249,407.34 | \$7,269,288.84 |
| 1977-0194-57 | SB | 12 | Sacramento, CA P\&DC | 291,458.90 | 38,345.37 | \$146.713.12 | \$287,569.62 | \$1,213,745.76 | \$60,687.29 | \$1,562,002.66 |
| 1977-0194-57 | $\pi$ | 39 | Sacramento, CA P\&DC | 1,657,801.10 | 157.648.00 | \$1,112,660.84 | \$2,074,771.51 | \$5,123,291.69 | \$256,164.58 | \$7,454,227.78 |
| 1977-0194-57 | Total | 51 | Sacramento, CA P\&DC | 1,949,260.00 | 195,993.37 | \$1,259,373.96 | \$2,362,341.13 | \$6,337,037,45 | \$316,851.87 | \$9,016,230.45 |
| 1977-0194-57 | SB | 6 | San Bernardino, CA P\&DC | 98,686.50 | 10,777.00 | \$49,676.32 | \$104,346.93 | \$341,331.56 | \$17,066.58 | \$462,745.07 |
| 1977-0194-57 | TT | 3 | San Bernardino, CA P\&DC | 189,450.60 | 20,041.00 | \$127,152.93 | \$209,275.15 | \$651,404.68 | \$32,570.23 | \$893,250.06 |
| 1977-0194-57 | Total | 9 | San Bernardino, CA P\&DC | 288,137.10 | 30,818.00 | \$176,829.24 | \$313,622.08 | \$992,736.24 | \$49,636.81 | $\$ 1,355,995.14$ |
| 1977-0194-57 | SB | 0 | San Francisco, CA NDC |  |  | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| 1977-0194-57 | Spotters | 8 | San Francisco, CA NDC | 5,064.90 | 20,259.60 | \$3,399.39 | \$15,766.52 | \$685,382.80 | \$34,269.14 | \$735,418.45 |
| 1977-0194-57 | Total | 8 | San Francisco, CA NDC | 5,064.90 | 20,259.60 | \$3,399.39 | \$15,766.52 | \$685,382.80 | \$34,269.14 | \$735,418.45 |
| 1977-0194-57 | SB | 38 | San Francisco, CA P\&DC | 664,583.40 | 63,267.00 | \$334,534.67 | \$563,107.32 | \$2,106,188.08 | \$105,309.40 | \$2,774,604.81 |
| 1977-0194-57 | $\pi$ | 41 | San Francisco, CA P\&DC | 1,941,829.40 | 138,038.00 | \$1,303,291.17 | \$2,413,377.29 | \$4,669,472.87 | \$233,473.64 | \$7,316,323.81 |
| 1977-0194-57 | Total | 79 | San Francisco, CA P\&DC | 2,606,412.80 | 201,305.00 | \$1,637,825.83 | \$2,976,484.62 | \$6,775,660.96 | \$338,783.05 | \$10,090,928.62 |
| 1977-0194-57 | SB | 13 | San Jose, CA P\&DC | 260,167.00 | 21,624.00 | \$130,961.56 | \$257,784.88 | \$720,000.12 | \$36,000.01 | \$1,013,785.00 |
| 1977-0194-57 | $\pi$ | 12 | San Jose, CA P\&DC | 326,003.00 | 25,031.40 | \$218,802.35 | \$391,402.91 | \$847,015.34 | \$42,350.77 | \$1,280,769.02 |
| 1977-0194-57 | Total | 25 | San Jose, CA P\&DC | 586,170.00 | 46,655.40 | \$349,763.91 | \$649,187.79 | \$1,567,015.46 | \$78,350.77 | \$2,294,554.02 |

## EXHIBIT D

| 5505 COST EVALUATION - POSTAL VEHICLE SERVICE VS. CONTRACT SERVICE |  |  |  |  | 26+27 | 29+30 |  |  | 28-31 |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| FACILITY | 3. Annual Miles | 4. Annual Hours | 26. PVS Costs | 27. Mgmt Cost | 28. Total PVS Costs | 29. Annual HCR Cost | 30. Annual HCR Mgmt Cost | 31. Total Annual HCR Cost | Savings=PVS-HCR | PVS/HCR Recom'd | VEHICLES | TRAILERS |
| ANAHEIM PDF | 215,390 | 25,426 | \$1,899,988.57 | \$58,924.76 | \$1,958,913.32 | \$458,780.70 | \$999.00 | \$459,779.70 | \$1,499,133.62 | HCR | 8 | 4 |
| INDUSTRY PDC | 328,028 | 21,860 | \$1,863,526.16 | \$50,660.55 | \$1,914,186.71 | \$816,789.72 | \$999.00 | \$817,788.72 | \$1,096,397.99 | HCR | 12 | 3 |
| LONG BEACH PDC | 346,333 | 39,848 | \$3,022,344.05 | \$92,347.74 | \$3,114,691.79 | \$869,295.83 | \$999.00 | \$870,294.83 | \$2,244,396.96 | HCR | 11 | 3 |
| LOS ANGELES NDC | 0 | 38,866 | \$2,885,256.93 | \$90,071.96 | \$2,975,328.89 | \$1,943,300.00 | \$999.00 | \$1,944,299.00 | \$1,031,029.89 | HCR | 13 | 0 |
| LOS ANGELES PDC | 2,152,099 | 332,224 | \$24,217,249.71 | \$769,929.12 | \$24,987,178.83 | \$6,606,943.93 | \$999.00 | \$6,607,942.93 | \$18,379,235.90 | HCR | 94 | 116 |
| M. SELLERS PDC | 2,331,703 | 191,399 | \$15,635,983.58 | \$443,567.18 | \$16,079,550.76 | \$4,360,284.61 | \$999.00 | \$4,361,283.61 | \$11,718,267.15 | HCR | 53 | 68 |
| OAKLAND PSF | 1,908,278 | 222,778 | \$17,160,470.74 | \$516,288.02 | \$17,676,758.76 | \$4,350,873.84 | \$999.00 | \$4,351,872.84 | \$13,324,885.92 | HCR | 60 | 187 |
| SACRAMENTO PDC | 2,230,892 | 193,108 | \$15,685,638.81 | \$447,527.79 | \$16,133,166.60 | \$3,837,134.24 | \$999.00 | \$3,838,133.24 | \$12,295,033.36 | HCR | 52 | 70 |
| SAN BERNARDINO PDC | 216,157 | 29,573 | \$2,214,867.14 | \$68,535.43 | \$2,283,402.57 | \$443,121.85 | \$999.00 | \$444,120.85 | \$1,839,281.72 | HCR | 14 | 17 |
| SAN FRANCISCO NDC | 0 | 17,241 | \$1,317,588.41 | \$39,956.02 | \$1,357,544.43 | \$862,050.00 | \$999.00 | \$863,049.00 | \$494,495.43 | HCR | 8 | 0 |
| SAN FRANCISCO PDC | 2,725,484 | 236,159 | \$19,133,458.90 | \$547,298.48 | \$19,680,757.38 | \$5,069,400.24 | \$999.00 | \$5,070,399.24 | \$14,610,358.14 | HCR | 81 | 110 |
| SAN JOSE PDC | 674,398 | 78,734 | \$5,980,128.44 | \$182,466.05 | \$6,162,594.49 | \$1,389,198.08 | \$999.00 | \$1,390,197.08 | \$4,772,397.41 | HCR | 25 | 22 |
| SANTA ANNA PDC | 632,782 | 70,663 | \$5,382,174.59 | \$163,761.50 | \$5,545,936.09 | \$1,904,673.82 | \$999.00 | \$1,905,672.82 | \$3,640,263.27 | HCR | 26 | 7 |
| 13 PVS FACILITIES | 13,761,544 | 1,497,879 | \$116,398,676.03 | \$3,471,334.60 | \$119,870,010.62 | \$32,911,846.86 | \$12,987.00 | \$32,924,833.86 | \$86,945,176.76 | HCR | 457 | 607 |

## EXHIBIT E

| U.S. Postal Service PVS SCHEDULE | Postal Facility SAN FRANCISCO |  |  | Schedule Type DX -Daily Exception |  |  | $\begin{array}{\|c\|} \hline \text { Tour } \\ 3 \end{array}$ | $\begin{array}{\|c\|} \hline \text { Run No. } \\ 637 \\ \hline \end{array}$ | $\begin{aligned} & \hline \text { Miles } \\ & 23.80 \end{aligned}$ | $\begin{aligned} & \hline \text { Freq } \\ & \text { OK67 } \end{aligned}$ | Tractor | Sched No. $32637$ |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| $\begin{gathered} \hline \text { Effective Date } \\ 7 / 31 / 2010 \end{gathered}$ | $\begin{aligned} & \hline \text { Discontinue } \\ & 12 / 31 / 2011 \end{aligned}$ | $\begin{gathered} \hline \text { Keys } \\ 0 \end{gathered}$ | Other | Un | $\begin{aligned} & \text { igned } \\ & 00: 00 \end{aligned}$ | 0 | $\begin{aligned} & \text { Iter } \\ & \text { 00:00 } \end{aligned}$ |  | $\begin{aligned} & \hline \text { Time } \\ & : 15 \end{aligned}$ | $\begin{gathered} \hline \text { Sched } \\ 14: 4 \end{gathered}$ | $\begin{aligned} & \text { e Hrs. } \\ & \text { 19:00 } \end{aligned}$ | Lunch |



| 4870338 |  |  |  |  |  |  |  |  |  |
| :--- | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| TIMES Route | TIMES Trip <br> B637 | ANNUAL <br> TOTALS | Sched Miles: | Total Hours: | Weekday Hours: | Saturday Hours: | Sunday Hours: | Holiday Hours: | Night Diff Hours: |
| 940VS |  |  | 5984.75 | $1068: 42$ | $1068: 42$ | $00: 00$ | $00: 00$ | $00: 00$ | $251: 28$ |

Comments: REPORT TO SUPERVISOR, TRANSPORTATION OPERATIONS DURING UNASSIGNED TIME. UPON ARRIVAL REPORT TO TME, TAKE MAIL AS DIRECTED, ASSIST IN LOADING \& UNLOADING, NO SMOKING WHILE LOADING \& UNLOADING, KEEP DOORS LOCKED, CHOCK WHEELS UPON ARRIVAL \& REPLACE BEFORE DEPARTURE. ****FOR EMERGENCY \& BREAKDOWNS CALL (415) 550-5063****

| Stop | TRIP |  | Service Point | ARR <br> TIME | $\begin{aligned} & \text { DEP } \\ & \text { TIME } \end{aligned}$ | DOOR |  | Operating Instructions |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | IN | OUT |  |  |  | IN | OUT |  |
| 1 |  |  | PVS - SAN FRANCISCO | 14:45 | 15:00 |  |  | USE VEHICLE 1. OBTAIN KEYS, CHECK VEHICLE. |
| 2 |  |  | P\&DC - SAN FRANCISCO | 15:01 | 15:15 |  |  |  |
| 3 |  |  | NORTH BEACH STATION | 15:35 | 15:50 |  |  | DX-337 K67 1535-1550 |
| 4 |  |  | CA STATE COMPENSATION | 16:10 | 16:25 |  |  | DX-337 K67 1610-1625 |
| 5 |  |  | P\&DC - SAN FRANCISCO | 16:45 | 17:00 |  |  |  |
| 6 |  |  | BERNAL HEIGHTS STATION | 17:20 | 17:35 |  |  | DX-337 K67 1720-1735 |
| 7 |  |  | EXCELSIOR STATION | 17:50 | 18:05 |  |  | DX-337 K67 1750-1805 |
| 8 |  |  | P\&DC - SAN FRANCISCO | 18:30 | 18:44 |  |  |  |
| 9 |  |  | PVS - SAN FRANCISCO | 18:45 | 19:00 |  |  | **SERVICE/PARK VEHICLE, END TOUR** |

## EXHIBIT F

Mail Processing Network Rationalization
Service Changes, 2011

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO AMERICAN POSTAL WORKERS UNION INTERROGATORIES (APWU/USPS-28, 35 AND 37)

The United States Postal Service hereby files an institutional response to the above-listed interrogatories of the American Postal Workers Union dated April 6, 2012.

Each interrogatory is stated verbatim and followed by the response.
Respectfully submitted,
UNITED STATES POSTAL SERVICE
By its attorneys:
Anthony F. Alverno, Jr.
Chief Counsel, Global Business and Service Development

Michael T. Tidwell

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2998; Fax -5402

July 2, 2012

## INSTITUTIONAL RESPONSE OF THE UNITED STATES POSTAL SERVICE TO AMERICAN POSTAL WORKERS UNION INTERROGATORY

## APWU/USPS-35

a. For the most recent period available, provide the underlying components of the data from the Vehicle Maintenance Accounting System that are used to produce the per mile and per hour rates used by the Postal Service to calculate the cost of PVS operations. For example, please show fuel costs, maintenance costs, parts costs, depreciation, hours and miles separately for each of the types of equipment in the following list:
i. single axle tractors
ii. dual axle tractors
iii. trailers
iv. 11 ton straight trucks
v. $\quad 9$ ton straight trucks
vi. 7 ton straight trucks
vii. 2 ton vans
viii. $2.1 / 2$ ton vans.
b) Please describe what labor costs would be included in these calculations. If there are LDC 30 and LDC 31 hours included in these numbers please be explicit about how those costs are included.

## RESPONSE:

a. Vehicle cost categories used to calculate cost per hour and cost per mile in the Vehicle Management Accounting System (VMAS) includes Fuel and Oil, Allied Labor, VMF Parts, Direct Maintenance Labor, Contract Labor, Contractor Parts, Distributed Cost, and Vehicle Depreciation.

# INSTITUTIONAL RESPONSE OF THE UNITED STATES POSTAL SERVICE TO AMERICAN POSTAL WORKERS UNION INTERROGATORY 

## RESPONSE to APWU/USPS-35 (continued)

October 2011 - March 2012
Reference: Vehicle Maintenance Accounting System (VMAS)

|  | $\underline{C P M}$ | $\underline{C P H}$ |
| :--- | :---: | :---: |
| Single axle tractors | $\$ 1.19$ | $\$ 11.50$ |
| Dual axie tractors | $\$ 1.32$ | $\$ 15.45$ |
| Trailers | $\mathrm{N} / \mathrm{A}$ | $\mathrm{N} / \mathrm{A}$ |
| 11 ton straight trucks* | $\$ 1.53$ | $\$ 14.06$ |
| 9 ton straight trucks | $\mathrm{N} / \mathrm{A}$ | $\mathrm{N} / \mathrm{A}$ |
| 7 ton straight trucks | $\mathrm{N} / \mathrm{A}$ | $\mathrm{N} / \mathrm{A}$ |
| 2 ton vans | $\mathrm{N} / \mathrm{A}$ | $\mathrm{N} / \mathrm{A}$ |
| $21 / 2$ ton vans | $\mathrm{N} / \mathrm{A}$ | $\mathrm{N} / \mathrm{A}$ |

Trailer costs are not calcuated therefore not available
9 ton straight trucks are not in the fleet
7 ton straight truck costs are included with 11 ton 2 ton vans are not applicable to PVS
$21 / 2$ ton vans are not applicable to PVS

## Cost Components

Fuel
Allied Labor
VMF Parts
Direct Maintenance Labor
Contract Labor
Contract Parts
Distributed Cost
Vehicle Depreciation

| Cost Per Mile (CPM) |  |  |  |  |  |
| :--- | :--- | :--- | :--- | :--- | :--- |
| Single Axle | Dual Axle | $7 / 11$ Ton |  |  |  |
|  |  |  |  |  |  |
| $\$$ | 0.64 | $\$$ | 0.70 | $\$$ | 0.55 |
| $\$$ | 0.01 | $\$$ | 0.01 | $\$$ | 0.02 |
| $\$$ | 0.12 | $\$$ | 0.15 | $\$$ | 0.21 |
| $\$$ | 0.11 | $\$$ | 0.11 | $\$$ | 0.19 |
| $\$$ | 0.02 | $\$$ | 0.04 | $\$$ | 0.06 |
| $\$$ | 0.01 | $\$$ | 0.03 | $\$$ | 0.03 |
| $\$$ | 0.06 | $\$$ | 0.07 | $\$$ | 0.12 |
| $\$$ | 0.22 | $\$$ | 0.21 | $\$$ | 0.35 |


| Cost Per Hour (CPH) |  |  |  |  |  |
| :--- | :--- | :--- | :--- | :--- | :--- |
| Single Axle |  |  |  | Dual Axle | $7 / 11$ |
|  |  | Ton |  |  |  |
| $\$$ | 6.30 | $\$$ | 8.17 | $\$$ | 5.07 |
| $\$$ | 0.10 | $\$$ | 0.12 | $\$$ | 0.18 |
| $\$$ | 1.10 | $\$$ | 1.70 | $\$$ | 1.90 |
| $\$$ | 1.00 | $\$$ | 1.30 | $\$$ | 1.76 |
| $\$$ | 0.20 | $\$$ | 0.43 | $\$$ | 0.57 |
| $\$$ | 0.10 | $\$$ | 0.40 | $\$$ | 0.31 |
| $\$$ | 0.60 | $\$$ | 0.85 | $\$$ | 1.06 |
| $\$$ | 2.10 | $\$$ | 2.48 | $\$$ | 3.21 |

## Beference / Definition:

Allied Labor: USPS labor cost for fueling vehicles
Distributed Cost: USPS clerical and management labor cost
b. Labor costs are included in the table above. LDC 30 and LDC 32 hours are noted as Distributed Cost.


[^0]:    475 L'Enfant Plaza SW
    WAShington DC 20260-4100
    wwo.usps.com

[^1]:    *Annual hours and miles based upon estimate provided bv PVS Analyst unless otherwise noted.

