Office of Inspector General | United States Postal Service

Audit Report

Efficiency and Safety of Lift Gates

Report Number 20-203-R20 | September 16, 2020

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Highlights

Objective

Our objective was to evaluate the efficiency and safety of lift gates used on U.S. Postal Service cargo vans.

The Postal Service owns and operates a fleet of over 227,000 vehicles. The Postal Service has 7-and 11-ton cargo vans that Postal Vehicle Service (PVS) drivers use to transport mail between facilities and to load/unload mail from cargo vans.

In September 2017, the Postal Service began replacing 7-and 11-ton cargo vans and adding new lift gates. A lift gate is a piece of equipment on the rear of a cargo van that helps load/unload mail transport equipment (MTE) containing mail. When the Postal Service replaced the older cargo vans, transportation managers could choose between a tuck under lift gate (84 inches wide by 50 inches long) or rail lift gate (89 inches wide by 54 inches long). Tuck under lift gates tuck beneath the cargo van while rail lift gates fold against the back of the cargo van when not in use. The Postal Service purchased 1,167 tuck under lift gates and 446 rail lift gates on the 7-and 11-ton cargo vans for an estimated total cost of $6.5 million.

Cargo vans with lift gates provide the ability to load/unload mail safely and effectively and were designed to save time and decrease the handling of MTE compared to cargo vans without lift gates. If an employee identifies unsafe conditions with a lift gate, they should complete and submit Postal Service (PS) Form 1767, Report of Hazard, Unsafe Condition, or Practice. A supervisor is then required to investigate the alleged hazard and resolve the issue if applicable.

Findings

The new tuck under lift gates installed on 7-and 11-ton cargo vans may not be as efficient as the previous lift gates and potential safety issues exist if PVS drivers aren't trained properly.

When the Postal Service solicited suppliers for the new cargo vans, the only specification for the lift gate was weight capacity; no specific dimensions were provided. Postal Service transportation managers preferred tuck under lift gates over rail lift gates because they tuck beneath the cargo van and are out of the way while rail lift gates require lowering to get into the back of the cargo van. However, the tuck under lift gates require PVS drivers to be cautious when loading/unloading MTE. Specifically, the new tuck under lift gates are narrower and shorter than previous rail lift gates; therefore, less MTE can be placed on the tuck under lift gate at the same time compared to what could be loaded with previous rail lift gates.

Further, Postal Service transportation managers and supervisors, and PVS drivers informed us that the new tuck under lift gates are not as durable as the previous lift gates and tilt when loading/unloading MTE. However, Fleet Management personnel stated the new tuck under lift gates are durable and there have been no reported maintenance issues related to durability. The new tuck under lift gates are made of aluminum and support 3,300 pounds while previous lift gates were made of steel and supported 4,400 pounds. Despite this difference in capacity, the new tuck under lift gates should support MTE that is loaded with mail since they weigh anywhere from 600 to 2,000 pounds.

As a result, the size and construction of the new tuck under lift gates is one of the factors that could lead to PVS drivers being at the facility longer, which increases the risk for late PVS trips. For example, we analyzed the amount of time PVS drivers spent at 54 selected stations that use the new lift gates. In January 2018, we reviewed 1,945 trips and found the average time (arrival and departure times) spent at stations without docks using the previous lift gates was 12.5 minutes. In comparison, in January 2020, we reviewed 547 trips and the average time spent at these same stations with the new lift gates was 16.8 minutes (a 34.4 percent increase).

Additionally, we found potential safety issues related to training and concerns from employees with the new tuck under lift gates that resulted in three Occupational Safety and Health Administration (OSHA) complaints, 55 PS Forms 1767, and two grievances filed. One of the OSHA complaints resulted in a fine of $5,783. We also conducted interviews and received comments from various users addressing safety concerns related to the tuck under lift gates. The main safety issues we identified were:

- No safety rails on the side of the lift gate to prevent MTE from rolling off.
- More difficulty operating the lift gate on uneven surfaces.
- Some MTE has to be loaded sideways.
- Not sufficient room for a PVS driver to stand alongside MTE.
- Some MTE has to be pulled, not pushed, when loading/unloading.

We surveyed transportation managers and supervisors, PVS analysts, vehicle maintenance managers, and area and district safety managers to see if the new lift gates improved the safety of loading/unloading MTE. We received 215 responses out of the 686 surveys sent (31 percent) but only 140 were familiar with the safety of the new lift gates. Of the 140 managers, supervisors, and analysts who responded, almost half either disagreed or strongly disagreed that the new lift gates improved safety. However, managers from Fleet Management and Employee Resource Management stated the purchase of new lift gates were not intended to improve safety since equipment is only purchased if it is safe.

We further identified that the Postal Service does not have a national training program for operating the new lift gates. The Postal Service did train employees on the new lift gates at deployment; however, the training was not standardized. As a result, there is a potential safety concern with the new tuck under lift gates and further evaluation and training is needed.

Recommendations

We recommend management:

- Reevaluate the effectiveness of the new tuck under lift gates and the process of loading/unloading mail transport equipment to determine if changes are needed to increase efficiency.
- Perform a safety assessment to evaluate the new lift gates and develop a national training program and create a standard operating procedure on the operation and safety of the new lift gates.

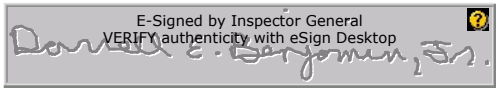
Transmittal Letter

OFFICE OF INSPECTOR GENERAL
UNITED STATES POSTAL SERVICE

September 16, 2020

MEMORANDUM FOR: ROBERT CINTRON
VICE PRESIDENT, LOGISTICS

SIMON STOREY
VICE PRESIDENT, EMPLOYEE RESOURCE MANAGEMENT



FROM: Darrell E. Benjamin, Jr.
Deputy Assistant Inspector General
for Mission Operations

SUBJECT: Audit Report – Efficiency and Safety of Lift Gates
(Report Number 20-203-R20)

This report presents the results of our audit of the Efficiency and Safety of Lift Gates.

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

Attachment

cc: Postmaster General
Corporate Audit Response Management

Results

Introduction/Objective

This report presents the results of our self-initiated audit of the Efficiency and Safety of Lift Gates (Project Number 20-203). Our objective was to evaluate the efficiency and safety of lift gates used on U.S. Postal Service cargo vans.

Background

The Postal Service owns and operates a fleet of over 227,000 vehicles that transport mail between processing plants and post offices. The Postal Service has 7-and 11-ton cargo vans that Postal Vehicle Service (PVS) drivers use to transport mail between facilities and to load/unload mail from cargo vans.

In September 2017, the Postal Service began replacing 7-and 11-ton cargo vans and adding new lift gates. A lift gate is a piece of equipment on the rear of a cargo van that helps load/unload mail transport equipment (MTE) containing mail. When the Postal Service replaced the older cargo vans, transportation managers could choose between a tuck under lift gate (84 inches wide by 50 inches long) or a rail lift gate (89 inches wide by 54 inches long). Tuck under lift gates tuck beneath the cargo van while rail lift gates fold against the back of the cargo van when not in use. The Postal Service purchased 1,167 tuck under lift gates and 446 rail lift gates on the new 7-and 11-ton cargo vans for a total estimated cost of $6.5 million.

"If an employee identifies unsafe conditions with a lift gate, they should complete and submit a PS Form 1767, Report of Hazard, Unsafe Condition, or Practice."

Cargo vans with the new lift gates provide the ability to load/unload mail effectively and safely and were designed to save time and decrease the handling of MTE compared to cargo vans without lift gates. If an employee identifies unsafe conditions with a lift gate, they should complete and submit a Postal Service (PS) Form 1767, Report of Hazard, Unsafe Condition, or Practice. A supervisor is then required to investigate the alleged hazard and resolve the issue if applicable.

Finding #1: Efficiency of Lift Gates

The new tuck under lift gates installed on 7-and 11-ton cargo vans may not be as efficient as the previous lift gates. When the Postal Service solicited suppliers for the new cargo vans, the only specification for the lift gate was weight capacity; no specific dimensions were provided. However, in February 2018, the supplier and the Postal Service tested the new cargo vans, including both new lift gates, in a controlled environment. The Postal Service identified certain issues[1] during the controlled testing which the supplier corrected before the purchase. Postal Service transportation managers preferred tuck under lift gates over rail lift gates because they tuck beneath the cargo van and are out of the way while rail lift gates require lowering to get into the back of the cargo van.

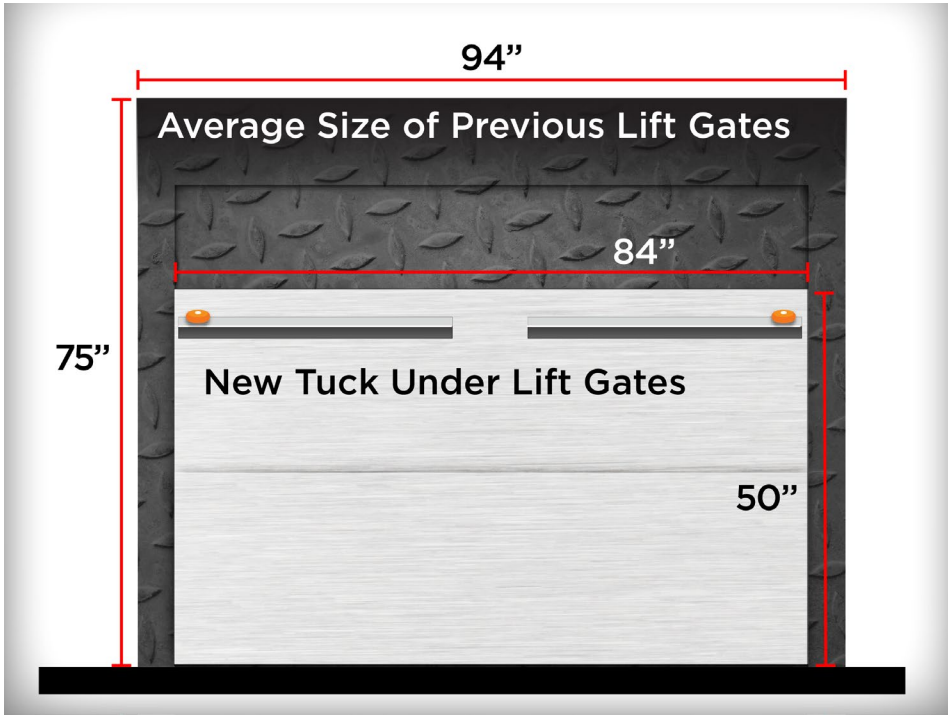
We conducted a survey that included questions about the efficiency of the new lift gates and sent it to Transportation and Networks System (TANS) managers, Vehicle Maintenance Facility (VMF) managers, Supervisor Transportation Operations (STO), district and area safety managers, and PVS analysts at the 151 Processing and Distribution Centers (P&DC) that use the new lift gates. We asked if the new lift gates improved efficiency and about 43 percent disagreed or strongly disagreed. The survey comments mentioned inefficiencies with the new lift gates due to their size and durability. See Appendix B for the results of the survey and Appendix C for additional comments.

Before the Postal Service purchased the new lift gates, there were an assortment of older lift gates, including tuck under lift gates. However, the Postal Service could not provide the exact specifications for all of the different types of older lift gates. During our audit, Postal Service personnel stated the new tuck under lift gates were smaller than the older rail lift gates. Due to the smaller size, less MTE can be placed on the lift gate at the same time compared to what could be loaded with the prior rail lift gates. The previous rail lift gates held two or three pieces of MTE, while the new tuck under lift gates hold only one or two pieces of MTE. This causes PVS drivers to operate the tuck under lift gates more often.

1 Issues with the operating pressure, handles, safety release knobs, the safety mechanism operation, and location of the safety chain.

For example, we did receive specifications for three older rail lift gates from management at the Portland VMF. The lift gates on average, measured 94 inches wide by 75 inches long. The new tuck under lift gates are 10 inches narrower and 25 inches shorter compared to the previous rail lift gates (see Figure 1).

Figure 1. Comparison of Previous Lift Gates to the New Tuck Under Lift Gate in Portland, OR



Source: Postal Service and U.S. Postal Service Office of Inspector General (OIG) calculations.

Additionally, to compensate for the smaller size, PVS drivers must place MTE, such as over the road (OTR)[2] containers and pallet jacks, sideways on the tuck under lift gates (see Figure 2). PVS drivers also have to pull MTE off the tuck under lift gate; however, Postal Service policy states that MTE should be pushed, rather than pulled.[3]

Figure 2. OTR Container on the New Tuck Under Lift Gate

Source: Picture from Postal Service presentation on the new tuck under lift gates on April 19, 2019. Also, the safety stoppers are not up.

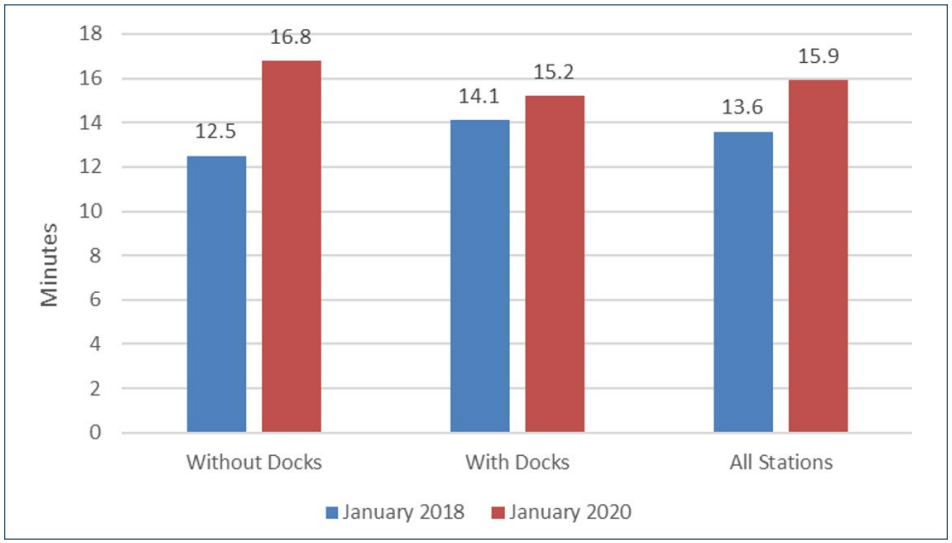
2 A heavy-duty aluminum container mounted on four metal wheels.
3 Handbook EL-814, *Postal Employee’s Guide to Safety.*

Further, Postal Service transportation managers and supervisors, and PVS drivers informed us that the new tuck under lift gates are not as durable as the previous lift gates and tilt when loading/unloading MTE. However, Fleet Management personnel stated the new tuck under lift gates are durable and there have been no reported maintenance issues related to durability. The new lift gates are made of aluminum and support 3,300 pounds while previous lift gates were made of steel and supported 4,400 pounds. Despite this difference in capacity, the new tuck under lift gates can support MTE that is loaded with mail since they weigh anywhere from 600 to 2,000 pounds.

> *"However, Fleet Management personnel stated the new tuck under lift gates are durable and there have been no reported maintenance issues related to durability."*

As a result, the size and construction of the new lift gates is one of the factors that could lead to some PVS drivers being at the facility longer, which increases the risk for late PVS trips. For example, we analyzed the amount of time PVS drivers spent at 54 selected stations[4] that use the new lift gates. We reviewed 1,945 trips from January 2018 and found the average time spent at stations without docks using the previous lift gates was 12.5 minutes. In comparison, we reviewed 547 trips from January 2020 and the average time spent at these same stations with the new lift gates was 16.8 minutes (a 34.4 percent increase). Similarly, we reviewed 4,089 trips from January 2018 and the average time spent at stations with docks using the previous lift gates was 14.1 minutes. In comparison, we reviewed 670 trips from January 2020, and the average time spent at these same stations with the new lift gates was 15.2 minutes (7.8 percent increase). See Figure 3.

Figure 3. Average Minutes at a Station



Source: Surface Visibility Web 2.0 (SVweb 2.0), Enterprise Data Warehouse (EDW), Fleet Management, and OIG calculations.

Recommendation #1

We recommend the **Vice President, Logistics**, reevaluate the effectiveness of the new tuck under lift gates and the process of loading/unloading mail transport equipment to determine if changes are needed to increase efficiency.

Finding #2: Safety of Lift Gates

The Occupational Safety and Health Act[5] is legislation that established a set of standards which requires employers to provide a safe workplace free of hazards, training, and written programs and action plans to prevent operational safety errors. Safety concerns exist with the new tuck under lift gates and there has not been a nationwide safety analysis completed.

4 We judgmentally selected stations to review based on their dock status and mail volume delivered. We calculated the time spent at each station by comparing the arrival and departure scans. The number of trip schedules for cargo vans using the new lift gates decreased by 65.8 percent in January 2020 compared to January 2018 at the 54 stations.

5 The Postal Service is subject to Public Law Number 91–596, the Occupational Safety and Health Act of 1970, pursuant to the Postal Employees Safety Enhancement Act of 1998 and *Employee and Labor Relations Manual.*

Since the purchase, we determined additional potential safety issues exist with the new tuck under lift gates relating to training and concerns from employees. Specifically, we identified safety concerns with the new lift gates that resulted in three Occupational Safety and Health Administration (OSHA)[6] complaints, 55 PS Forms 1767, and two grievances filed. We also conducted interviews and received comments on our Audit Asks page[7] addressing safety concerns related to the lift gates. Further, we surveyed Postal Service managers, supervisors, and analysts to determine if the new lift gates improved the safety of loading/unloading MTE.

Occupational Safety and Health Administration

OSHA is a government agency that ensures safe and healthful working conditions by setting and enforcing standards and providing training and assistance. When there are unsafe or unhealthy working conditions, a government employee can file a *Notice of Alleged Safety or Health Hazards* with OSHA.

We found three cases of Postal Service employees filing an OSHA complaint regarding the safety of the new lift gates. The first OSHA complaint was filed on May 28, 2019, about 20 months after deployment of the new lift gates. The employee filed a *Notice of Alleged Safety or Health Hazards* with the following issues at the Phoenix P&DC:

- Lift gates were red tagged[8] and placed out of service due to inadequate size and the angle of the lift gates.
- Management placed the lift gates back into service without following proper protocol or taking corrective action.

OSHA requested the Postal Service investigate the complaint and provide the results of the investigation and the corrective action taken. Postal Service management found that eight of the cargo vans equipped with the new lift gates were red tagged and sent to the VMF for inspection. Four of the cargo vans were inspected and found to be working within the manufacturer specifications with no defects and the other four cargo vans had work completed on them. OSHA closed this case on June 12, 2019, and there was no fine.

The second OSHA complaint was filed on May 29, 2019. The employee filed a *Notice of Alleged Safety or Health Hazards* with the following lift gate issues at the Phoenix P&DC:

- Short and narrow on 11-ton cargo vans.
- Steep incline when it is in the down position and when it is being raised.
- No side rails to prevent MTE from rolling off (see Figure 4).

Figure 4. Side Rails on Lift Gates

Source: Pictures from Postal Service personnel in Portland, OR, on October 13, 2019. Picture on the left is an older, customized rail lift gate with side rails. Picture on the right is the new tuck under lift gate with no side rails.

OSHA requested that the Postal Service investigate the complaint and provide the results of the investigation and the corrective action taken. To resolve the issue, Postal Service's Arizona District Safety office created an On-the-Job Safety Review/Analysis (JSA)[9] to address the safety concerns. The JSA was sent to transportation management at the Phoenix P&DC to share with the PVS drivers.

6 Part of the U.S. Department of Labor.
7 An external webpage providing information on the audit and an opportunity for the public to comment. Located on the OIG's website. The Audit Asks page was posted for public comment from April 8 to June 15, 2020.
8 PS Form 4707, Out of Order, is used to mark defective or inoperable equipment as "out of order".
9 PS Form 1783, On-the-Job Safety Review/Analysis, is used to analyze and correct potential hazards or accidents.

OSHA closed the complaint, with no fine, due to the completion of the JSA on June 12, 2019.

The third complaint was filed in November 2019. The employee filed a *Notice of Alleged Safety or Health Hazards* with the following issues at the Portland P&DC:

- Lift gates do not line up with the height of the dock surface.
- Lift gates cannot be leveled or adjusted to meet dock surface.
- Lift gates do not have side rails to prevent MTE from rolling off.

On April 27, 2020, OSHA issued a citation and a proposed penalty[10] for an Occupational Safety and Health Act violation,[11] citing the Postal Service for not providing employees with adequate training on how to load/unload MTE on the new lift gates installed on the 7-and 11-ton cargo vans.

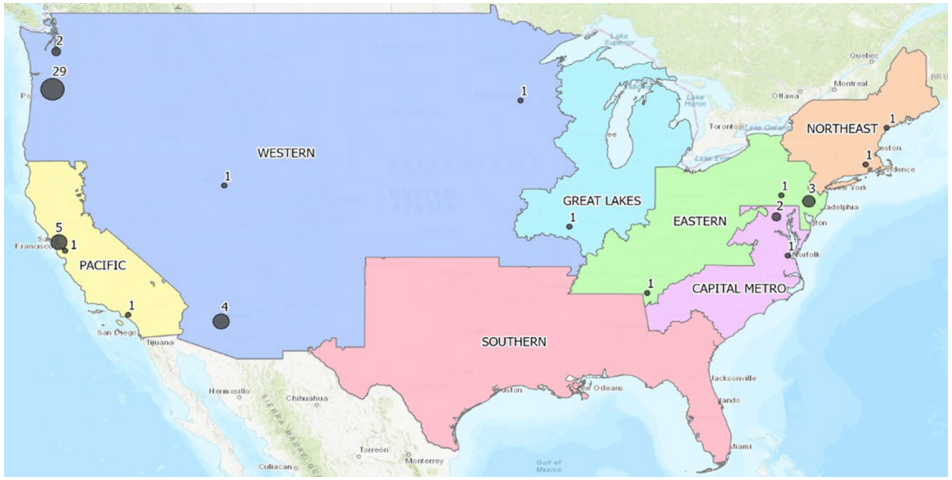
In June 2020, Postal Service management began to implement corrective actions at Portland, OR, facilities to address OSHA's citation. These corrective actions included creating a JSA on lift gate safety and providing additional training to PVS drivers on how to safely operate the new lift gates. Specifically, the JSA recommended pushing not pulling equipment, using both hands to maneuver the equipment, loading only one piece of equipment at a time sideways, parking on a level location, and ensuring there is enough room to rotate equipment for unloading. On June 2, 2020, OSHA considered the complaint resolved, but fined the Postal Service $5,783[12].

Postal Service Form 1767

The Postal Service uses PS Form 1767 to report safety hazards identified in the workplace. PS Form 1767 provides a channel of communication between employees and management that promotes a prompt analysis and response with corrective action to address allegations of unsafe practices.

We performed a nationwide analysis[13] of PS Forms 1767 that were entered into the Safety Toolkit[14]. We found 37 PS Forms 1767 that involved lift gate incidents in the Safety Toolkit and received an additional 18 PS Forms 1767 from the TANS manager at the Portland P&DC (see Figure 5). The PS Forms 1767 came from 13 different P&DCs out of 285 P&DCs nationwide.[15]

Figure 5. Map of Facilities with PS Form 1767 Complaints



Source: Safety Toolkit and OIG analysis. The number by each dot represents the number of PS Forms 1767 by location.

We reviewed the 55 PS Forms 1767 and identified the most common safety issues with the new lift gates:

- Inadequate space to safely load/unload MTE.
- Platform slopes at an angle.
- Not long enough to push MTE straight on.

10 Proposed penalty amount was $11,566.
11 Occupational Safety and Health Act of 1970 Section (5)(a)(1): The employer did not furnish employment and a place of employment which were free from recognized hazards that were causing or likely to cause death or serious physical harm to employees exposed to fall hazards and caught in hazards.
12 This cost is a one-time impact and is considered unrecoverable.
13 We reviewed PS Forms 1767 entered into the Safety Toolkit from October 1, 2018, to April 21, 2020.
14 A Postal Service application designed to assist Postal Service personnel in the collection, tracking, analysis, and reporting of safety and health-related information.
15 The other PS Forms 1767 came from other Postal Service facilities.

- Safety latches do not always stay locked, forcing PVS drivers to use one hand to hold MTE and one hand to operate the control box.
- Difficult to load/unload MTE in uneven parking lots.
- No safety rails to prevent MTE from rolling off.

"On PS Form 1767, there is a section for management to assess and address the issues identified."

On PS Form 1767, there is a section for management to assess and address the issues identified. The following are the actions listed on PS Form 1767:

- Describe the corrective action that was taken to eliminate the hazard, unsafe condition or practice.
- Create a work order and submit it to the maintenance manager to address the issue.
- Describe why there is no reasonable grounds to determine such a hazard exists.

Grievances

The Postal Service defines a grievance as a dispute, difference, or disagreement between parties. The grievance process allows employees to discuss and informally settle grievances with their immediate supervisor; however, if there is no resolution, the American Postal Workers Union (APWU) can file a formal grievance. Grievances are entered and tracked in the Grievance and Arbitration Tracking System (GATS)[16]. We identified two grievances related to the safety of the new lift gates.

In December 2018, APWU officials in Portland, OR, filed a grievance alleging Postal Service management had created an unsafe environment for PVS drivers by requiring them to use cargo vans equipped with the new lift gates. APWU officials identified the following safety issues related to the new lift gates:

- No safety rails to prevent MTE from rolling off.
- Unsafe to operate on uneven surfaces.[17]
- MTE must be loaded sideways due to the smaller size.
- Too narrow (see Figure 6).
- No tilt function.

Figure 6. Comparison of Size of Prior Lift and New Tuck Under Lift Gate

Source: Pictures from Postal Service personnel in Portland on October 13, 2019. Picture on the left is the old rail lift gate and the picture on the right is the new tuck under lift gate.

APWU officials requested management stop using the lift gates. Postal Service management said the APWU officials failed to provide evidence the lift gates were less safe than the previous lift gates used. Additionally, Postal Service management stated the lift gates are used in other districts across the country and there have been no pervasive problems reported or a corresponding increase in accidents and injuries directly attributed to the use of the new lift gates. However, the grievance is currently being reviewed by the Postal Service for resolution, according to the National Business Agent (NBA)[18].

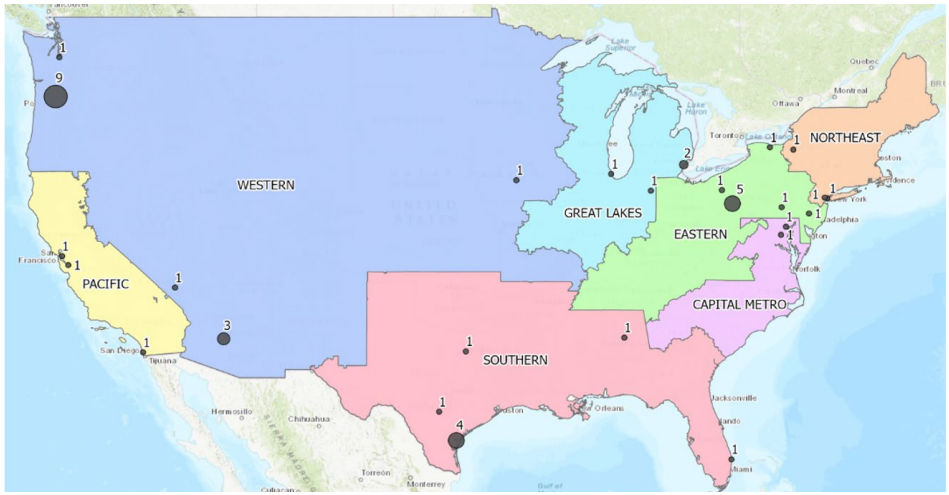
16 A Postal Service application used by managers to review labor relations activity, research grievances, appeals, disputed issues, and decisions.
17 This would be true for any type of lift gate, according to Fleet Management personnel.
18 An elected official responsible for one of the 15 regions of the country; serves the members and branches in their region as the liaison between employees and management by securing collective bargaining efforts for a safe and healthy work environment, better working conditions and a better standard of living.

In May 2019, APWU officials in Phoenix, AZ, filed a grievance alleging the new lift gates were unsafe because the lift gate is too small to hold two standard mail cages or one standard pallet safely and it sits at an acute angle when on the ground. The APWU alleges the driver was injured because management improperly put the cargo vans back in service without addressing their concerns that the lift gates were inadequate for loading MTE. Postal Service management responded that a JSA had been created by the Arizona District Safety office and the Phoenix VMF had twice re-certified the cargo vans and lift gates as working per the manufacturer specifications. APWU officials appealed the Postal Service actions in January 2020 and the grievance has been certified for arbitration, according to the NBA.

Other Safety Concerns

We found additional safety concerns with the new lift gates during our interviews, on our Audit Asks page, and the survey we sent to Postal Service managers, supervisors, and analysts. Specifically, we conducted interviews at specific sites[19] and with the APWU. We also received 49 relevant comments[20] on our Audit Asks page from Postal Service employees throughout the country (see Figure 7).

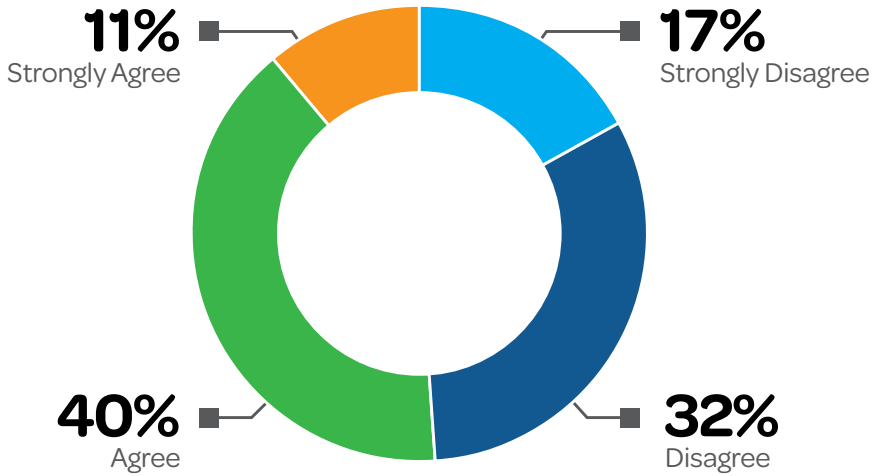
Figure 7. Map of Location Where Responses Came From



Source: Audit Asks and OIG analysis. The number by each dot represents the number of comments by location.

Additionally, we conducted a survey that included questions about the safety of the new lift gates. The survey was sent to TANS managers, VMF managers, STOs, district and area safety managers, and PVS analysts at facilities that use new lift gates. We asked if the new lift gates improved the safety of mail being loaded/unloaded onto the cargo vans. Almost half either disagreed or strongly disagreed that the new lift gates improved safety (see Figure 8). However, managers from Fleet Management and Employee Resource Management stated the purchase of new lift gates were not intended to improve safety since equipment is only purchased if it is safe. See Appendix B for the results of the survey and Appendix C for additional comments.

Figure 8. Survey Response on Safety of New Lift Gates



Source: Survey responses from Postal Service managers, supervisors, and analysts.

We identified the most common safety issues related to the new lift gates from the interviews, comments on the Audit Asks page, and the survey:

- No safety rails on the side of the lift gate to prevent MTE from rolling off.
- More difficulty operating the lift gate on uneven surfaces.
- Some MTE has to be loaded sideways.

19 Portland, Phoenix, Providence, North Houston, Philadelphia, and Sacramento P&DCs.
20 We could not determine the location of five of the comments.

- Not sufficient room for a PVS driver to stand alongside MTE.
- Some MTE has to be pulled, not pushed, when loading/unloading.
- Issues with the safety stoppers keeping MTE from falling off (see Figure 9).
- Durability due to the lift gates bending and tilting.

Figure 9. Pallet Jack With MTE Getting Stuck

Source: Picture from Phoenix P&DC personnel recording a PVS driver loading MTE with a pallet jack and getting stuck on the safety stopper. Fleet Management personnel stated the safety stoppers should be down when loading MTE.

The Postal Service has not conducted a nationwide safety analysis since the purchase of the new tuck under lift gates. Further, the Postal Service does not have a national training program for operating the new lift gates. OSHA found employees at the Portland P&DC did not receive satisfactory instruction and training to perform their daily duties in a manner that will keep them safe when using the new lift gates. The Postal Service had Driving Safety Instructors[21] train PVS drivers on the new lift gates at deployment; however, the training was not standardized. Additionally, 27 percent of the Postal Service managers, supervisors, and analysts[22] we surveyed disagreed or strongly disagreed the training provided was sufficient. See Appendix B for the results of the survey and Appendix C for additional comments.

"Further, the Postal Service does not have a national training program for operating the new lift gates."

As a result of the potential safety concerns, there is potential that PVS drivers could be at risk of injury because of inadequate physical protection and safety practices.

Recommendation #2

We recommend the **Vice President, Employee Resource Management**, perform a safety assessment to evaluate the new lift gates and in coordination with the **Vice President, Logistics**, develop a national training program and create a standard operating procedure on the operation and safety of the new lift gates to determine if modifications are needed.

Management's Comments

Management generally agreed with the findings and agreed with the recommendations. Based on subsequent conversations, management agreed with the monetary impact. See Appendix D for management's comments in their entirety.

Regarding the methodology used to evaluate the efficiency of the new tuck away lift gates, management stated the lift gates are not used at facilities with docks, therefore the lift gate should have no bearing on the driver's elapsed time-in-door. Further, management stated the comparison does not account for shifts in mail volume that may have resulted in higher container counts requiring more time to load the lift gates.

Regarding the dimensions of the new tuck under lift gates being a factor for inefficiency, management stated the new lift gates can accommodate all MTE and have a gross weight capacity of 3,300 pounds. Management agreed that the new

21 Postal Service employees who perform a variety of driver training and testing tasks.
22 The survey was sent to TANS managers, VMF managers, STOs, district and area safety managers, and PVS analysts at facilities that use the new lift gates.

lift gate dimensions will require a driver to load certain MTE sideways and the dimensions will limit the amount of MTE that can be loaded on the lift gates.

Regarding the size of the lift gates, management stated they did not agree with the size comparison the OIG made between the old rail lift gates and new tuck under lift gates because of the operational characteristics of each lift gate. Management stated that tuck under lift gates are smaller and rail lift gates are larger, by design, since a tuck under lift gate has to fit below the cargo van.

Regarding the safety of the new tuck under lift gates, management stated they performed a first article test prior to purchase. The test included management representatives from Safety, Vehicle Maintenance, Transportation, and the APWU, who identified no major design modifications and only minor modifications made by the manufacturer.

Regarding PS Forms 1767, management agreed that submitting PS Forms 1767 must be taken seriously and evaluated fully but had concerns the OIG attributed inordinate weight to these submissions considering the small sample size against the broader fleet deployment.

Regarding recommendation 1, management stated the new tuck under lift gates are effective for their defined purpose. Management also stated they are working with Safety to develop a national JSA and will develop a Standard Work Instruction (SWI) defining the loading/unloading process for tuck under lift gates allowing for more efficient transactions. Management originally provided a target implementation date of November 2021, but in subsequent correspondence updated the target implementation date to November 30, 2020.

Regarding recommendation 2, management stated that Safety will conduct another assessment of the lift gate to develop a national JSA and work with the Vice President, Logistics, to design training and a SWI. Management originally provided a target implementation date of November 2021, but in subsequent correspondence updated the target implementation date to November 30, 2020.

Evaluation of Management's Comments

The OIG considers management's comments responsive to the recommendations in the report and management's corrective actions should resolve the identified issues.

Regarding the concern with the methodology used to evaluate the efficiency of the new tuck away lift gates, management stated that lift gates are not used at facilities with docks. However, during our audit, management stated that lift gates were used at facilities with docks, which was supported by Postal Service data. Regarding management's concern that the OIG did not account for shifts in mail volume which require more time-in-door at a facility, we stated in our report that the size and construction of the new lift gates was one of the factors — but not the only factor — that could lead to some PVS drivers being at facilities longer.

Regarding management's concerns with the inefficiency of the new tuck under lift gates, we stated in the report that, despite the difference in capacity between the old and new lift gates, the new tuck under lift gates can support MTE that is loaded with mail since they weigh anywhere from 600 to 2,000 pounds.

Regarding management's concern with the specifications of the previous tuck under lift gates, the Postal Service could not provide the exact specifications for any of the different types of older lift gates. In addition, Postal Service personnel stated that the new tuck under lift gates were smaller than the older rail lift gates. However, we did receive dimensions of old rail lift gates from the Portland VMF. As stated in the report, this was just an example of the difference in the size of the old rail lift gates and the new tuck under lift gates.

Regarding management's concern with the safety of the new tuck under lift gates, the report discusses the fact that the First Article Test was performed; however, our audit identified potential safety issues after deployment of the new tuck under lift gates.

Regarding management's concerns with 55 PS Forms 1767, we considered all of the evidence related to safety of the new tuck under lift gates. While this included the 55 PS Forms 1767, it also included three OSHA complaints (with one resulting in a fine of $5,783); two grievances filed; interviews we conducted; comments we received on our Audit Asks page addressing safety concerns; and a survey we sent to Postal Service managers, supervisors, and analysts.

All recommendations require OIG concurrence before closure. Consequently, the OIG requests written confirmation when corrective actions are completed. All recommendations should not be closed in the Postal Service's follow-up tracking system until the OIG provides written confirmation that the recommendations can be closed.

Appendices

Click on the appendix title below to navigate to the section content.

Appendix A: Additional Information

Scope and Methodology

The scope of this audit was the new tuck under and rail lift gates on the Postal Service's 7-and 11-ton cargo vans.

To accomplish our objective, we:

- Interviewed personnel at headquarters in Logistics, Engineering, Fleet Management, and Supply Management.
- Interviewed transportation managers, supervisors, and PVS drivers at selected facilities.
- Worked with Postal Service NBAs and OSHA officials on gathering documentation on lift gates.
- Reviewed the first article testing and determined if changes were made to the lift gates before the Postal Service purchased them.
- Identified tools, systems, and metrics used to measure efficiency of the new lift gates.
- Performed efficiency tests by comparing how long cargo vans with the old lift gates and cargo vans with the new lift gates were at facilities.
- Identified reported safety incidents related to the new lift gates and the costs associated with these safety incidents.
- Reviewed OSHA complaints and grievances related to the new lift gates.
- Determined possible safety concerns related to the new lift gates by reviewing PS Forms 1767.
- Reviewed responses to our Audit Asks page.
- Surveyed TANS managers, VMF managers, STOs, district and area safety managers, and PVS analysts at facilities that use the new lift gates and analyzed the results.

We conducted this performance audit from March through September 2020 in accordance with generally accepted government auditing standards and included such tests of internal controls as we considered necessary under the circumstances. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective. We discussed our observations and conclusions with management on August 14, 2020, and included their comments where appropriate.

We assessed the reliability of data from SVweb 2.0, EDW, Safety Toolkit system, and GATS by reviewing existing information about the systems and interviewing Postal Service officials knowledgeable about the data. We determined that the data were sufficiently reliable for the purposes of this report.

Prior Audit Coverage

The OIG did not identify any prior audits or reviews related to the objective of this audit within the last five years.

Appendix B: Survey Results

On May 12, 2020, we surveyed 686 TANS managers, VMF managers, STOs, district and area safety managers, and PVS analysts at facilities that use the new lift gates. The last day to respond to the survey was May 26, 2020. We received 215 responses (31 percent). Below are the questions and results of the survey.[23]

Regarding the efficiency of the new lift gates, 137 respondents were familiar with and 78 were unfamiliar with the efficiency of the new lift gates. Of the 137 respondents that were familiar with the new lift gates, 43 percent felt the new lift gates did not improve efficiency. Regarding the safety of the new lift gates, 140 respondents were familiar with and 75 were unfamiliar with the safety of the new lift gates. Of those 140 respondents, 49 percent felt the new lift gates did not improve safety. Finally, regarding training on the use of lift gates, of the 214 respondents[24], 58 (about 27 percent) felt the training was insufficient (see Table 1).

Table 1. Survey Results on Efficiency, Safety, and Training

Survey Questionnaire	Strongly Disagree	Disagree	Percent Strongly Disagree/Disagree	Agree	Strongly Agree	Percent Strongly Agree/ Agree
Lift gates have improved the efficiency of mail being loaded and unloaded onto the truck.	25	34	43%	59	19	57%
Lift gates have improved the safety of mail being loaded and unloaded onto the truck.	24	45	49%	56	15	51%
The Postal Service has provided sufficient training for the use of the lift gates.	17	41	27%	135	21	73%

Source: Results from OIG survey using Survey Gizmo and OIG analysis.

In addition, we asked Postal Service managers, supervisors, and analysts about which type of lift gate they had experience with, if PS Forms 1767 were being submitted, and how many have been submitted related to the new lift gates. Specifically, 46 percent of the Postal Service managers, supervisors, and analysts that responded stated no PS Form 1767 were submitted related to the new tuck under lift gates and 43 percent were unsure (see Table 2).

23 After each question, there was a section to enter any comments.
24 One respondent did not answer this question.

Table 2. Remaining Survey Results

Survey Questionnaire	Survey Responses Percent			
	Tuck Under	Rail	Both	Neither
Please choose which lift gates you have experience with?	47%	12%	17%	24%
	Yes	**No**	**Unsure**	
Are drivers submitting a PS Form 1767 when a safety concern arises with the lift gates?	21%	39%	40%	
	0	**1 – 10**	**11 – 20**	**Unsure**
How many PS Forms 1767 have been submitted related to the new lift gates?	46%	10%	1%	43%

Source: Results from OIG survey using Survey Gizmo and OIG analysis.

Appendix C: Example Survey Comments on Efficiency, Safety, and Training

Question: "Please specify how the new lift gates have improved efficiency and/or why they have not."	
Positive Comments	They allow mail to be loaded and unloaded easier at stations without proper docks.
	Better, smoother operation and, lighter.
	The lift allows the PVS driver to efficiently and safely load and unload to and from ground level.
	Lightweight platform works well.
	If the trucks were not equipped with the lift gates, all mail and packages would have to be loaded/unloaded by hand individually.
	They have now improved the efficiency.
Negative Comments	Too many accidents because of the odd sizing.
	The lifts are not durable nor safe to operate with loaded equipment.
	Seems less space for equipment and tilts a little forward - more than usual which prompts drivers to hold onto the equipment.
	Less equipment being off loaded and falling off vehicle.
	Drivers complain they do not feel they are safe, so they load less equipment on them making the loading/unloading take longer.

Question: "Please specify how the new lift gates have improved safety and/or if there have been any safety incidents or complaints related to them."	
Positive Comments	Rail pops up to stop equipment from rolling off.
	The anti-rollback kick plate allows the equipment to stay on the lift gate while raising and lowering.
	The flip on the end of the platform works really well compared to the old style.
	We have enjoyed the width of the lift.
	Smoother operation, lighter and better.
	Lift gates when used correctly are safe regardless of manufacturer.

Question: "Please specify how the new lift gates have improved safety and/or if there have been any safety incidents or complaints related to them."	
Negative Comments	We have had more safety issues and equipment drops and this puts my drivers at risk.
	The new lifts are also always at a notable angle while in use.
	There were provisions to prevent containers from falling off where these do not.
	They are too shallow; cargo stops on gate have releases on the sides rather than the front.
	The rail lift gate, when backing up, causes a blind spot in the backup camera seeing how close to the dock they are.

Question: "The Postal Service has provided sufficient training for the use of the new lift gates."	
Positive Comments	All drivers received familiarity/training when vehicles arrived new.
	Driver one-on-one training and vehicle familiarization training provided by appointed with safety instructors.
	Both style lift gates were provided to the Districts Driver Safety Instructors to ensure training on proper techniques were provided to all Motor Vehicle Craft Personnel, prior to each using the equipment.
	Each driver was trained how to operate these lift gates safely and efficiently.
	Training regarding the lift gates was provided specifically by the Driver Safety Instructors of our Safety Division.
Negative Comments	No training program available.
	Safety was not provided training program information for lift gates for review.
	I have not had training on the new lifts.
	VMF personnel do not receive any new vehicle training.
	I am not familiar with a training program.

Appendix D: Management's Comments

UNITED STATES POSTAL SERVICE

September 9, 2020

LAZERICK C. POLAND
DIRECTOR, AUDIT OPERATIONS

SUBJECT: **Efficiency and Safety of Lift Gates (Project Number 20-203-DRAFT)**

Thank you for providing the Postal Service with an opportunity to review and comment on the recommendations contained in the draft audit report, Efficiency and Safety of Lift Gates.

Surface Transportation generally agrees with the report's findings of fact but has concerns with the methodology used to evaluate efficiency of the new tuck away lift gates. The audit report cites a time-in-door comparison of January 2018 and January 2020 at 54 stations using the new lift gates. The analysis reflects an increase in time at stations with docks. Lift gates are not used at facilities with docks and as such, the lift gate should have no bearing on the driver's elapsed time-in-door. Additionally, this comparison does not account for shifts in mail volumes that may have resulted in higher container counts requiring more time to complete the transaction.

The audit report states that the dimensions of the new tuck under lift gates are a factor in the reported inefficiency due to PVS driver's caution during the load/unload process and decreased container capacity. The new lift gates can accommodate all mail containers types and have a gross weight capacity of 3,300 pounds. It is agreed that the new lift gate dimensions will require a driver to load certain MTE types sideways. It is also agreed that the dimensions will limit the number of containers that can be placed on the device.

The audit report states that the exact specifications of previous tuck under lift gates could not be defined and as such, a dimensional comparison was made to previous rail lift gates. Surface Transportation does not agree that this comparison is appropriate due to the operational characteristics of each lift gate type. Tuck under lift gates are, by design, smaller so the entire unit fits below the van and

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does not interfere with backing into a dock door. Rail lift gates do not have this limitation and can therefore be dimensionally larger.

Regarding the safety of the new tuck under lift gates, a first article test was performed prior to purchase of the devices. This test included management representatives from Safety, Vehicle Maintenance and Transportation as well as representatives selected by APWU. No major design modifications were identified during the first article test and any minor modifications were agreed to and completed by the manufacturer.

As for the 55 PS Form 1767s submitted citing safety concerns with the new tuck under lift gates, 29 of these (representing 52%) were from one facility. The remaining 1767s submitted were spread over 15 other facilities nationally. The audit report states that there are 151 facilities that use the new lift gates so the number of facilities where 1767s have been submitted is approximately 10%. While Surface Transportation agrees that these 1767 submissions must be taken seriously and evaluated fully, we believe that the audit report attributes an inordinate weight to these submissions considering the small sample size against the broader fleet deployment.

OIG Recommendation #1:
We recommend the Vice President, Logistics, reevaluate the effectiveness of the new tuck under lift gates and the process of loading/unloading mail transport equipment to determine if changes are needed to increase efficiency.

Management Response/Action Plan:
Management agrees with this recommendation though we believe the new tuck under lift gates are effective for their defined purpose. Surface Transportation is working with Safety to develop a national Job Safety Analysis (JSA). Additionally, Surface Transportation will develop Standard Work Instruction (SWI) defining the loading/unloading process for tuck under lift gates allowing for more efficient transactions.

Target implementation Date:
November 2021

Responsible Officials:
Director, Surface Transportation
Sr. Director, Occupational Safety & Heath

OIG Recommendation #2:
We recommend the Vice President, Employee Resource Management, perform a safety assessment to evaluate the new lift gates and in coordination with the Vice President, Logistics, develop a national training program and create a standard

operating procedure on the operation and safety of the new lift gates to determine if modifications are needed.

Management Response/Action Plan:
Management agrees with this recommendation. Safety will conduct another assessment of the lift gate to develop a national Job Safety Analysis (JSA) and will work with the VP Logistics to design training and standard work instructions.

Target implementation Date:
November 2021

Responsible Officials:
Director, Surface Transportation
Sr. Director, Occupational Safety & Heath

Robert Cintron
Vice President
Logistics

Simon Storey
Vice President
Employee Resource Management

cc: Manager, Corporate Audit Response Management
Director, Surface Transportation
Director, Occupational Safety & Heath

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