November 19, 2010

LAURA M. HUBRICH
SENIOR PLANT MANAGER (A), SALT LAKE CITY PROCESSING AND DISTRIBUTION CENTER

SUBJECT: Audit Report – Internal Controls over Powered Industrial Vehicles at the Salt Lake City Processing and Distribution Center and Salt Lake City Auxiliary Service Facility (Report Number NO-AR-11- 003)

This report presents the results of our review of internal controls over powered industrial vehicles (PIVs) at the Salt Lake City Processing and Distribution Center (P&DC) and the Salt Lake City Auxiliary Service Facility (ASF) (Project Number 10XG047NO000). This was a self-initiated audit. Our objective was to determine whether internal controls over PIVs were in place at the Salt Lake City P&DC and ASF. See Appendix A for additional information about this audit.

PIVs include tow motors, fork trucks, tractors, platform lift trucks, motorized hand trucks, and other specialized industrial trucks powered by electric motors or internal combustion engines. Postal Service managers are required to provide a safe and healthful workplace free of recognized hazards and to follow Occupational Safety and Health Administration (OSHA) standards.

Conclusion

The Salt Lake City P&DC and ASF were able to effectively manage workhours in tow and forklift operations.[1] However, these facilities did not always manage internal controls over PIV safety and maintenance. Specifically, management did not ensure:

- Certification of powered equipment operators.[2]
- Completion of OSHA checklists by PIV drivers.
- Timely completion of preventive maintenance or repairs to vehicles.
- Compliance with district procedures on the use of portable electronic devices.

This occurred because some managers were new in their positions and not aware of required PIV internal controls. See Appendix B for our detailed analysis of this topic. Consequently, the Postal Service [redacted] receiving approximately $210,000 [redacted]. See Appendix C for details on the potential impact of this issue.

[1] In Fiscal Year (FY) 2009, management assigned the Salt Lake City ASF a new finance number. For the purpose of this report, we have combined the Salt Lake City P&DC and ASF workhours and volumes for FY 2009.
[2] In November 2008, OSHA cited the Salt Lake City P&DC for allowing uncertified drivers to operate a PIV.

Even though management took corrective action and implemented procedures to ensure PIV drivers completed checklists and certifications, and that managers were aware of their responsibilities over PIV internal controls, continuous monitoring is necessary to ensure the safety of employees. At our exit conference on September 28, 2010, Salt Lake City P&DC and ASF managers committed to improving internal controls over PIV equipment inventory.

We recommend the acting senior plant managers, Salt Lake City P&DC and ASF, continue to ensure that:

1. Employees complete Occupational Safety and Health Administration checklists as required.

2. Units certify all of their powered industrial vehicle drivers.

3. Units complete preventive maintenance and powered industrial vehicles repairs on a timely basis.

4. Employees follow district procedures on the use of portable electronic devices.

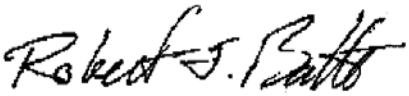
Management's Comments

Management agreed with the findings, recommendations, and monetary impact. Management implemented procedures to ensure that vehicle operators complete OSHA checklists and certifications to operate vehicles as well as follow district procedures on the use of portable electronic devices. Management also adjusted preventive maintenance routes to ensure timely completion of PIV maintenance and repairs. See Appendix D for management's comments in their entirety.

Evaluation of Management's Comments

The U.S. Postal Service Office of Inspector General (OIG) considers management's comments responsive to the recommendations in the report.

The OIG considers all recommendations significant, and therefore requires OIG concurrence before closure. Consequently, the OIG requests written confirmation when corrective actions are completed. These 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.



Robert J. Batta
Deputy Assistant Inspector General
for Mission Operations

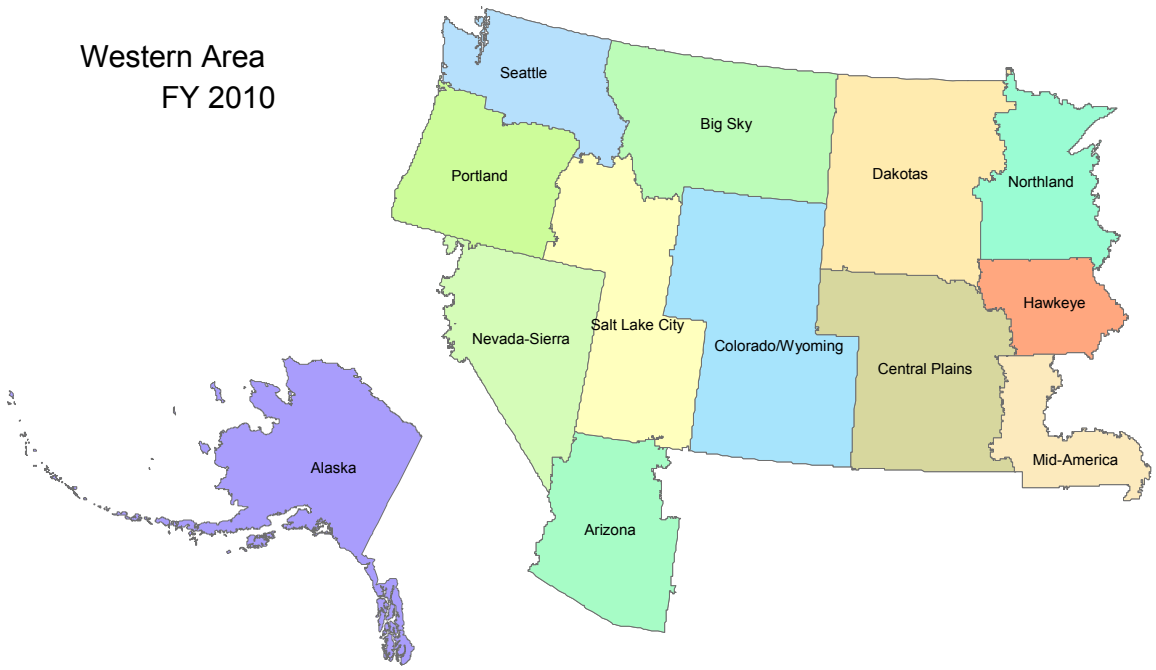
Attachments

cc: Patrick R. Donahoe
Steven J. Forte
David E. Williams Jr.
Frank Neri
Kenneth S. McArthur
Corporate Audit and Response Management

APPENDIX A: ADDITIONAL INFORMATION

BACKGROUND

We reviewed internal controls over PIVs at the Salt Lake City P&DC and ASF, located in the Western Area, Salt Lake City District. The map below shows the Western Area Districts.



The Salt Lake City P&DC processed 1,361,983,563 first handling pieces (FHPs) and used 678,329 Function 1 workhours inFY 2009. The Salt Lake City ASF processed 34,689,674 FHPs and used 297,673 Function 1 workhours in FY 2009. In FY 2009, management assigned the Salt Lake City ASF a separate finance number. For the purpose of this audit, we have combined the workhours and volumes for the two facilities. The Postal Service owns both facilities.

The Salt Lake City P&DC and ASF did not have an automated monitoring system, such as the Powered Industrial Vehicle Management System (PIVMS). The PIVMS consists of intelligent wireless devices installed on PIV and client-server software for access control, utilization analysis, real-time location tracking, and many other functions. As of October 2009, the Postal Service had installed PIVMS in 66 P&DCs. Over 160 P&DCs did not have this system, and managed PIV operations through other means.

OSHA regularly inspects Postal Service facilities. In FY 2009, OSHA conducted nearly 190 inspections of postal facilities. Since January 2010, OSHA has fined the Postal Service more than $4.6 million. Most of the fines resulted from electrical hazards such

as inadequately trained employees performing work without the proper protective equipment. The largest fines since January 2010 involved willful violations and the average fine as of September 2, 2010, was $213,505.

OBJECTIVE, SCOPE, AND METHODOLOGY

Our objective was to determine whether internal controls over PIVs were in place at the Salt Lake City P&DC and ASF. To conduct this audit, we relied on computer-processed data maintained by Postal Service Operational Systems, which included the Web-based Complement Information System, the Enterprise Data Warehouse system, and the Maintenance Activity Reporting and Scheduling System (eMARS). We did not test the validity of controls over these systems. However, we checked the accuracy of the data by confirming our analysis and results with Postal Service managers and found that the data was sufficiently reliable.

We conducted this performance audit from July through November 2010 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 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 officials on September 28, 2010, and included their comments where appropriate.

PRIOR AUDIT COVERAGE

We issued one prior audit report addressing mail processing internal controls at the Dallas Bulk Mail Center.[3] The audit found internal controls were generally in place and effective. However, controls over mail reporting, timekeeping, color coding, and preventive maintenance required strengthening.

[3] *Mail Processing Internal Controls at the Dallas Bulk Mail Center,* (Report Number NO-AR-06-009 dated September 28, 2006).

APPENDIX B: DETAILED ANALYSIS

Tow and Forklift Workhour Trends

We found that the Salt Lake City P&DC and ASF were able to effectively manage workhours in tow and forklift operations. We analyzed FHP productivity, overtime trends in mail processing operations (referred to as Function 1) and in tow and forklift operations, and the percentages of Function 1 hours used in tow and forklift operations for FYs 2007 through 2009.

From FY 2007 to 2009, FHP volume decreased by more than 8 percent, while workhours used in mail processing decreased by almost 15 percent. Consequently, productivity improved by 7.54 percent. Salt Lake City P&DC and ASF productivity in FY 2009 was one of the highest in the country at 1,431 pieces per hour, compared to the national average of 789 pieces per hour. In addition, mail processing overtime at the Salt Lake City P&DC and ASF decreased from over 13 percent to almost 5 percent from FY 2007 to 2009.

The Salt Lake City P&DC and ASF used 6.28 percent of mail processing workhours in tow and forklift operations in FY 2009 compared to the national average of 6.86 percent. Management decreased workhours used in tow and forklift operations by 15,406 workhours (or approximately 20 percent) from FY 2007 to 2009. Nationally, workhours in these operations decreased 15.65 percent.

Management at the Salt Lake City P&DC and ASF controlled workhours used in tow and forklift operations by evaluating equipment operator staffing levels and productivity. In addition, Salt Lake City P&DC management used a tray management system (TMS)[4] which reduced the number of PIVs needed for operations (see Illustration 1).

[4] The TMS is a transportation and information system that automates the movement of trays of mail within a plant. The TMS reduces tow and forklift workhours by inducting incoming mail trays directly from the docks to mail processing equipment.

Illustration 1: TMS at the Salt Lake City P&DC on July 15, 2010.

Salt Lake City facility management stated that observing employees on the job was their primary method for evaluating equipment operator staffing levels and productivity.

The President's Commission on the U.S. Postal Service's July 31, 2003 report recommended that the mission of the Postal Service be ". . . to provide high-quality, essential postal services to all persons and communities by the most cost-effective and efficient means possible at affordable and, where appropriate, uniform rates." Title 39 U.S.C. Part 1, Chapter 4, § 403, states, "The Postal Service shall plan, develop, promote, and provide adequate and efficient postal services at fair and reasonable rates and fees."

The Postal Accountability Enhancement Act of December 2006, P.L. 109-435, Title II dated December 20, 2006, indicates ". . . the need for the Postal Service to increase its efficiency and reduce its costs, including infrastructure costs, to help maintain high quality, affordable postal services. . . ."

Internal Controls over PIVs at the Salt Lake City P&DC and ASF

We found that the Salt Lake City P&DC and ASF did not always manage controls over PIV safety and maintenance.

Safety

Management did not always ensure that only certified PIV drivers operated vehicles. OSHA standards require that employers certify that each operator has received training and evaluate each operator at least once every 3 years. Additionally, the standards require employers to evaluate operators' performance and determine whether they are competent to operate a powered industrial truck safely.

In November 2008, OSHA cited the Salt Lake City P&DC for allowing uncertified drivers to operate PIVs. OSHA found that management "…did not ensure all forklift operators were properly trained in operation of powered industrial trucks," but did not assess any fines or penalties with the citation. Management responded to the citation on November 25, 2008, stating they had corrected the violation. However, we found that from March 28 through June 5, 2010, 42 percent of the vehicle drivers (28 of the 66) at the Salt Lake City P&DC and ASF were uncertified. During the audit, management certified all of these employees.

In addition, Salt Lake City P&DC and ASF managers did not always ensure that PIVs were operated safely. For example:

- OSHA standards require a daily pre-shift inspection of PIVs and completion of a checklist. Management at both facilities stated they did not require daily completion of the checklist. During our audit, management implemented procedures to ensure that PIV drivers completed OSHA checklists daily.

- We observed a PIV operator wearing headphones while driving a vehicle, which is prohibited by the Salt Lake City District policy on portable electronic devices. We brought this to management's attention and they had the driver remove the headphones (see Illustration 2).

Illustration 2: We observed a PIV operator at the Salt Lake City P&DC driving a forklift while wearing a portable electronic device on [redacted]

The *Strategic Transformation Plan 2006 to 2010* states, "Perhaps the greatest investment the Postal Service can make for employees is maintaining a safe work

environment — making sure they return home to their families each day the same way they came in to work." In addition, the plan says, "The Postal Service is subject to the reporting requirements of the Occupational Safety and Health Administration and follows the required criteria and reporting methodology. Providing a safe workplace is a demonstration of the commitment the Postal Service has to its employees."

Maintenance

Although management monitored vehicle battery usage, they did not always perform preventive maintenance as required or repair vehicles at the Salt Lake City P&DC and ASF when necessary.

- Management did not routinely follow up to ensure that maintenance employees performed all required preventive maintenance on PIVs. We took a random sample of all preventive maintenance records for five of the 31 vehicles at the Salt Lake City P&DC from July 15, 2009 through July 15, 2010. As an example, we found that maintenance employees did preventive maintenance on one tow motor only 11 times during the year instead of the required 52 times.

- Management did not always ensure that maintenance repaired vehicles when necessary. For example, management removed one vehicle (tow motor B-19) from service on [redacted] because the brakes were not functioning properly (see Illustration 3).

Illustration 3: The yellow tag on tow motor B-19 indicated that the brakes required repair on [redacted]

On August 10, 2010, we found that the vehicle (tow motor B-19) was back in service although maintenance had performed no repair work. We brought this to management's attention and they immediately removed the vehicle from the workroom floor and issued a new work order to repair the brakes.

APPENDIX C: OTHER IMPACT[5]

The Postal Service is at risk [redacted]

Assets at Risk

Issues at Salt Lake City	[redacted]
[redacted]	
Total $210,000	

[5] Assets at risk of loss because of inadequate internal controls.

[6] [redacted]

APPENDIX D: MANAGEMENT'S COMMENTS

SALT LAKE CITY PROCESSING & DISTRIBUTION CENTER

UNITED STATES POSTAL SERVICE

DATE: November 5, 2010

SUBJECT: Transmittal of Draft Audit Report – Internal Controls over Powered Industrial Vehicles at the Salt Lake City Processing and Distribution Center and Salt Lake City Auxiliary Service Facility (Report Number NO-AR-11- DRAFT)

MEMORANDUM FOR: Lucine Willis
Director, Audit Operations

After reviewing the audit, management agrees with the findings in general and has addressed the four specific audit recommendations below. The Salt Lake City Processing & Distribution Center management team has already implemented corrective actions and processes including follow-up tracking to remedy the recommendations from the audit.

Recommendation 1: Employees complete Occupational Safety and Health Administration checklists as required.

Management Response/Action Plan: Management agrees with this recommendation. As stated in the draft audit report, management took corrective action and implemented procedures that require all PIV drivers to complete the necessary checklists.

Target Implementation Date: This was completed before the exit conference, which was held on September 28, 2010. The PIV operators have been instructed on the checklist process. Completed sign-off logs are forwarded to the Safety Specialist. He then files and monitors the procedure for compliance. All managers and supervisors are responsible to monitor the process during their operational tour.

Responsible Official:
Safety Specialist and Operational Managers and Supervisors.

Recommendation 2: Units certify all of their powered industrial vehicle drivers.

Management Response/Action Plan: Management agrees with this recommendation. As stated in the draft audit report, management took corrective action and implemented procedures to assure that employees were properly certified.

Target Implementation Date: This action was completed before the exit conference, which was held on September 28, 2010. The Safety Specialist continues to monitor the certification of PIV drivers.

1760 W 2100 S
Salt Lake City UT 84199-9997
801-974-2948
801-974-2324 (Fax)

Responsible Official:
Safety Specialist

Recommendation 3: Units complete preventive maintenance and powered industrial vehicle repairs on a timely basis.

Management Response/Action Plan: Management agrees with this recommendation. Since the exit interview on September 28, 2010, preventative maintenance routes have been adjusted to assure timely completion of PIV repairs and maintenance. Maintenance reports are generated daily and reviewed by the Manager, Maintenance to ensure compliance. An example of this report is attached from the eMARS system, showing all routes were 100% complete. In addition, Plant Maintenance sends out information daily to operational managers that states which of the PIVs are not operational.

Target Implementation Date:
This was completed by October 23, 2010.

Responsible Official:
Manager, Maintenance

Recommendation 4: Employees follow district procedures on the use of portable electronic devices.

Management Response/Action Plan: Management agrees with this recommendation. All managers and supervisors have been advised to monitor the use of portable electronic devices. This occurs daily and also during individual PIV observation certification.

Target Implementation Date:
This was completed in October 23, 2010.

Responsible Official:
All Operational Managers

Laura M. Hubrich
Senior Plant Manager (A)
Processing and Distribution Center
Salt Lake City, UT

cc: Steven J. Forte
David E. Williams Jr.
Frank Neri
Kenneth S. McArthur
Shaun Mossman
Jeffrey Harris
Manager, Corporate Audit Response Management

MAINTENANCE REPORT

PM Completion Rate with Total Time (hours) by Acronym & Equipment

(Detail Report Summarized weekly)

SALT LAKE CITY
1760 WEST 2100 SOUTH
SALT LAKE CITY, UT. 84199-9740

FISCAL PERIOD> **2011|02|1**

U.S.P.S.: eMARS Reports
DATE: 11/04/2010
TIME: 08:55:20

SubSite 00

Acronym MOPE

Sched FYPDWK	FYPDWK	Equip No.	Route No.	PM Freq	Work Code	Crew ID	Sched Time	Actual Time	Qty Sched	Qty Comp	Qty Partial	Qty Bypass	Reasons					% Comp	% Partial Comp	% ByPassed
													0	1	7	8	9			
2011021	2011021	21	3221	W	03	031	1.0	0.5	1	1	0	0	0	0	0	0	0	100.0	0.0	0.0
2011021	2011021	22	3222	W	03	052	1.5		1	0	0	1	1	0	0	0	0	0.0	0.0	100.0
2011021	2011021	26	3026	W	03	031	0.2	0.2	1	1	0	0	0	0	0	0	0	100.0	0.0	0.0
2011021	2011021	27	3227	W	03	031	1.0	1.0	1	1	0	0	0	0	0	0	0	100.0	0.0	0.0
2011021	2011021	28	3228	W	03	031	1.0	0.5	1	1	0	0	0	0	0	0	0	100.0	0.0	0.0
2011021	2011021	29	3229	W	03	031	1.0	0.2	1	1	0	0	0	0	0	0	0	100.0	0.0	0.0
2011021	2011021	30	3230	W	03	031	0.8	0.4	1	1	0	0	0	0	0	0	0	100.0	0.0	0.0
2011021	2011021	31	3231	W	03	020	1.0	1.0	1	1	0	0	0	0	0	0	0	100.0	0.0	0.0
2011021	2011021	33	3233	W	03	031	0.2	0.2	1	1	0	0	0	0	0	0	0	100.0	0.0	0.0
2011021	2011021	34	3234	W	03	020	1.0	1.0	1	1	0	0	0	0	0	0	0	100.0	0.0	0.0
2011014	2011021	35	3235	W	03	031	1.0	0.5	1	1	0	0	0	0	0	0	0	100.0	0.0	0.0
2011021	2011021	35	3235	W	03	031	1.0	1.0	1	1	0	0	0	0	0	0	0	100.0	0.0	0.0
2011021	2011021	36	3236	W	03	031	1.0	0.5	1	1	0	0	0	0	0	0	0	100.0	0.0	0.0
2011014	2011021	37	3237	W	03	031	1.0		1	0	0	1	1	0	0	0	0	0.0	0.0	100.0
2011014	2011021	38	3238	W	03	031	1.0		1	0	0	1	1	0	0	0	0	0.0	0.0	100.0
2011021	2011021	38	3238	W	03	031	1.0	2.0	1	1	0	0	0	0	0	0	0	100.0	0.0	0.0
2011021	2011021	40	3240	W	03	031	0.2	0.2	1	1	0	0	0	0	0	0	0	100.0	0.0	0.0
2011021	2011021	42	3242	W	03	031	2.2	1.2	1	1	0	0	0	0	0	0	0	100.0	0.0	0.0

* This report is based on Preventive Maintenance data that is summarized weekly.
Reason Note: Reason 9 is not included in the calculations of percentages and totals for QTY SCHED and QTY BYPASS.

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Page 1

MAINTENANCE REPORT

PM Completion Rate with Total Time (hours) by Acronym & Equipment

(Detail Report Summarized weekly)

SALT LAKE CITY
1760 WEST 2100 SOUTH
SALT LAKE CITY, UT. 84199-9740

FISCAL PERIOD> 2011|02|1

U.S.P.S.: eMARS Reports
DATE: 11/04/2010
TIME: 08:55:20

SubSite 00

Acronym MOPE

Sched FYPDWK	FYPDWK	Equip No.	Route No.	PM Freq	Work Code	Crew ID	Sched Time	Actual Time	Qty Sched	Qty Comp	Qty Partial	Qty Bypass	Reasons					% Comp	% Partial Comp	% ByPassed
													0	1	7	8	9			
2011021	2011021	43	3243	W	03	031	2.2	2.2	1	1	0	0	0	0	0	0	0	100.0	0.0	0.0
2011021	2011021	44	3244	W	03	020	0.2	0.2	1	1	0	0	0	0	0	0	0	100.0	0.0	0.0
2011021	2011021	49	3249	W	03	031	0.2	0.2	1	1	0	0	0	0	0	0	0	100.0	0.0	0.0
2011021	2011021	51	3251	W	03	031	1.0	1.5	1	1	0	0	0	0	0	0	0	100.0	0.0	0.0
2011021	2011021	52	3252	W	03	031	1.0	1.0	1	1	0	0	0	0	0	0	0	100.0	0.0	0.0
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2011021	2011021	56	3256	W	03	031	1.0	0.5	1	1	0	0	0	0	0	0	0	100.0	0.0	0.0
2011021	2011021	57	3257	W	03	031	1.0	0.5	1	1	0	0	0	0	0	0	0	100.0	0.0	0.0
2011021	2011021	58	3258	W	03	020	1.0	1.0	1	1	0	0	0	0	0	0	0	100.0	0.0	0.0
2011021	2011021	59	3301	W	03	020	0.4		1	0	0	1	1	0	0	0	0	0.0	0.0	100.0
2011021	2011021	60	3260	W	03	020	1.0	1.0	1	1	0	0	0	0	0	0	0	100.0	0.0	0.0
2011021	2011021	61	3261	W	03	020	1.0	1.0	1	1	0	0	0	0	0	0	0	100.0	0.0	0.0
2011013	2011021	B-1	3201	M	03	031	0.5		1	0	0	1	1	0	0	0	0	0.0	0.0	100.0
2011021	2011021	B-1	3201	W	03	031	1.0		1	0	0	1	1	0	0	0	0	0.0	0.0	100.0
2011021	2011021	B-19	3219	W	03	020	0.2	0.2	1	1	0	0	0	0	0	0	0	100.0	0.0	0.0
2011021	2011021	B-20	3220	W	03	020	0.2	0.2	1	1	0	0	0	0	0	0	0	100.0	0.0	0.0
2011021	2011021	BOOM	3221	W	03	024	1.5	1.5	1	1	0	0	0	0	0	0	0	100.0	0.0	0.0

* This report is based on Preventive Maintenance data that is summarized weekly.
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Page 2

MAINTENANCE REPORT

PM Completion Rate with Total Time (hours) by Acronym & Equipment

(Detail Report Summarized weekly)

SALT LAKE CITY
1760 WEST 2100 SOUTH
SALT LAKE CITY, UT. 84199-9740

FISCAL PERIOD> 2011|02|1

U.S.P.S.: eMARS Reports
DATE: 11/04/2010
TIME: 08:55:20

SubSite 00

Acronym MOPE

Sched FYPDWK	FYPDWK	Equip No.	Route No.	PM Freq	Work Code	Crew ID	Sched Time	Actual Time	Qty Sched	Qty Comp	Qty Partial	Qty Bypass	Reasons 0	1	7	8	9	% Comp	% Partial Comp	% ByPassed
2011021	2011021	C175	4001	W	04	020	0.5		1	0	0	1	1	0	0	0	0	0.0	0.0	100.0
2011021	2011021	C177	4003	W	04	020	0.5		1	0	0	1	1	0	0	0	0	0.0	0.0	100.0
2011021	2011021	C178	4003	W	04	020	0.5		1	0	0	1	1	0	0	0	0	0.0	0.0	100.0
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2011021	2011021	C184	4152	W	04	020	0.5		1	0	0	1	1	0	0	0	0	0.0	0.0	100.0
2011021	2011021	C186	3086	W	03	020	0.3		1	0	0	1	1	0	0	0	0	0.0	0.0	100.0
2011021	2011021	GEN1	3301	W	03	020	0.4	0.4	1	1	0	0	0	0	0	0	0	100.0	0.0	0.0
MOPE, Senior Total:							36.7	22.8	45	30	0	15	15	0	0	0	0	66.7	0.0	33.3
MOPE, FyPdWk: 2011021 Total:							36.7	22.8	45	30	0	15	15	0	0	0	0	66.7	0.0	33.3
Acronym MOPE Total:							36.7	22.8	45	30	0	15	15	0	0	0	0	66.7	0.0	33.3
Subsite 00 Total:							36.7	22.8	45	30	0	15	15	0	0	0	0	66.7	0.0	33.3

	Sched Time	Actual Time	Qty Shed	Qty Comp	Qty Partial	Qty Bypass	Reasons 0	1	7	8	9	% Comp	% Part Comp	% ByPass
Total for All Subsites:	36.7	22.8	45	30	0	15	15	0	0	0	0	66.7	0.0	33.3

* This report is based on Preventive Maintenance data that is summarized weekly.
Reason Note: Reason 9 is not included in the calculations of percentages and totals for QTY SCHED and QTY BYPASS.

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Page 3