

**BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001**

**Evolutionary Network Development
Service Changes, 2006**

Docket No. N2006-1

**INTERROGATORIES OF AMERICAN POSTAL WORKERS UNION, AFL-CIO TO
THE UNITED STATES POSTAL SERVICE (APWU/USPS-1-5)
(April 21, 2006)**

Pursuant to Rules 25, 26, and 27 of the Rules of Practice, The American Postal Workers Union, AFL-CIO directs the following interrogatories to the United States Postal Service.

Respectfully submitted,

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APWU/USPS-1 Referring to Mr. Vogel's "Template" Power Point presented in response to institutional interrogatory OCA/USPS-20, on page 12 of that presentation Mr. Vogel outlines the "Processing Network Vision," the first bullet point of that vision states:

"Optimized mailing industry workshare/outsourcing opportunities"

- a) Please describe what optimized workshare/outsourcing opportunities means.
- b) Is this the primary goal of network reorganization?
- c) Is the definition of what is "optimal" for the processing and distribution network that is mentioned as point 2 on page 12 of that presentation determined by that goal?
- d) If so, what parameters are used in the END process to test for that?

APWU/USPS-2 Your responses to POIR 1 Question 3(b) and 3(c) seem to indicate that the goal of END is to realign and consolidate the network and to eliminate excess processing capacity and that goal is paramount regardless of the impact on service. Is that a correct understanding of your responses?

APWU/USPS-3 In response to POIR 1 Question 2(b)(iii), you indicate that critical entry times are an output from the operating plan and a number of other factors. Does this mean that the model indicates or suggests that critical entry times need to be adjusted to make the operating plan submitted work? If so, please explain how the model accomplishes this.

APWU/USPS-4 In response to POIR 1 Question 3(d) and 3(e) you make reference to Dispatch of Value times and their relationship to Critical Entry Times and Clearance Times. Can you please provide a definition of those three concepts and explain how one impacts or determines the others?

APWU/USPS-5 For the AMPs that are listed in N2006-1/5 that have already been implemented, please provide a detailed listing of any changes that have taken place to Critical Entry Times, Clearance Times and Dispatch of Value times related to those implementations.