

**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
USPS WITNESS WILLIAMS (APWU/USPS T2-58-63)
(May 10, 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 USPS witness David E. Williams. If the witness is unable to respond to any interrogatory, APWU requests that a response be provided by an appropriate person capable of providing an answer.

Respectfully submitted,

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APWU/USPS-T2-58. On May 3, 2006, the Postal Board of Governors approved a new collocated processing center and vehicle maintenance facility in Oklahoma City, OK.

- a) Please confirm that this new processing facility will become a regional distribution center. If not, please identify which type of facility it will become.
- b) Please provide a detailed description of the information that the END process provided to the decision-makers in deciding to build a new processing center at this location.
- c) The presentation to the BOG indicated that parcels and bundles from the Tulsa P&DC, the Little Rock P&DC, the Fayetteville P&DF and the Ft. Smith MPO would be moved to this new processing center.
 - i) Please identify which classes of mail are included in this transfer
 - ii) Was the AMP process used to make the decisions to move this mail to the Oklahoma City processing facility?
 - iii) If the AMP process was not used, please describe in detail the process by which the decisions were made to move the mail from each of these facilities to the Oklahoma facility
- d) Will originating mail from other postal facilities be moved to the Oklahoma Processing Center when it is complete?
 - i) If so, was the AMP process used to make that determination?
 - ii) If originating mail will be moved and an AMP process was not used please provide a description of the process that was used to make these decisions

APWU/USPS-T2-59. To clarify your responses to APWU/USPS-T2-11 about the construction of the NE Michigan facility Pontiac, Michigan

- a) Since the Detroit BMC is scheduled to become an RDC, will this new facility be designated a Local Processing Center? If not, please indicate what type of facility this will be.
- b) The presentation to the Board of Governors indicated that this facility would consolidate mail processing activities currently taking place in Troy, Pontiac and Royal Oak. Please confirm that this includes moving originating mail from these facilities to the new Michigan facility? Are there other activities that will be moved from Troy, Pontiac or Royal Oak to this facility? If so, what are they and from what facility will they be moved?
- c) Please confirm that originating mail from Detroit and Flint will be moved to this facility. Are there other activities that will be moved from Detroit or Flint to this facility? If so, what are they and from what facility will they be moved?
- d) Was the AMP process used to make the determination whether or not to move originating mail into the new facilities as referenced in b and c above? If not, what type of analysis was used to make these determinations?
- e) What other types of mail processing activities will be consolidated in the new facility and where will that mail be coming from?

- f) Did the Decision Analysis Report concerning this new facility include consideration of the cost savings or benefits from moving the activities referenced in b and c above?

APWU/USPS-T2-60. Mr. Vogel has indicated in past presentations that there will be a reduction in the number of facilities doing processing and distribution work during the network alignment period and has, at times, provided an approximate number of facilities that will be closed.

- a) Please provide the latest estimate of the number of each type of facility that will be needed in the redesigned network.
- b) Please provide the latest estimate of the number of each current type of facility that will be closed during the next 5 years.
- c) Will facilities scheduled for closure primarily be distribution processing centers? If not, which facilities are most likely to be closed?
- d) Are the END models designed to indicate which facilities should be closed? If the END model does not assign any mail to a particular facility will it be scheduled for closure?
- e) Will the AMP process be used to close facilities?
- f) Please describe the communications plan and level of community involvement that the USPS is expected to use when a facility is scheduled for complete closure.

APWU/USPS-T2-61. Please identify differences between the communications plans used in the AMP process and the "Public Input Process" or PIP plan the USPS has recently announced.

APWU/USPS-T2-62. In clarification of your responses to APWU/USPS-T2-1(g-h)

- a) What is the Postal Services' record retention policy for AMP studies?
- b) Of the seven AMPs approved in 2003 and 2004, have post implementation reviews been conducted for any of those? If so, please provide all post implementation reports for those sites.
- c) If Post implementation reviews have not been conducted or completed please indicate the scheduled completion time for the post implementation reviews for each of the facilities.

APWU/USPS-T2-63. In clarification of your response to APWU/USPS-T2-1(a)

- a) Excluding the seven AMPs on this list that are included in N2006-1/5, please confirm that three of the remaining ones are on the list of 41 attached to your testimony (Beaumont to Houston, Canton to Akron and Zanesville to Columbus) and that one (Batesville) is there but with a different receiving facility than originally stated.
- b) Are the AMPs on this list that are not either in N2006-1/5 or on your attachment still suspended? Have they been cancelled?

- c) In your answer to APWU/USPS-T2-1(e) you state that none of the suspended AMPs were cancelled due to results from the AMP process; what did determine the Postal Service's decision to not go forward with them?