

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

EVOLUTIONARY NETWORK DEVELOPMENT
SERVICE CHANGES, 2006

Docket No. N2006-1

RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO APWU INTERROGATORIES APWU/USPS-T2-75 THROUGH 78
REDIRECTED FROM WITNESS WILLIAMS
(June 9, 2006)

The United States Postal Service hereby submits its responses to the following interrogatories of the American Postal Workers Union, AFL-CIO, filed on May 16, 2006: APWU/USPS-T2-75 through 78. The interrogatories have been redirected from witness Williams to the Postal Service for an institutional response.

Each interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF AMERICAN POSTAL WORKERS UNION
REDIRECTED FROM WITNESS WILLIAMS**

APWU/USPS-T2-75 The Bridgeport, CT AMP, submitted as part of N2006-1/5 shows a downgrade of approximately 4,131 FCM pieces per day on worksheet 7 and worksheet 8 indicates that there will be no negative service commitment impacts to other classes of mail. Please consult the USPS response provided to DBP/USPS-80 and confirm the following changes in service standards:

- a) FCM service standards for ZIP 066 show an upgrade for 29 zip code pairs. Please explain the results provided in worksheet 7 given this service standard listing.
- b) Priority mail service standards for ZIP 066 show an upgrade for 9 zip code pairs. Please explain the results provided on worksheet 7a given this service standard listing.
- c) Package service standards for ZIP 066 are shown to have been downgraded for 47 zip code pairs and upgraded for 218 zip code pairs.
- d) Standard mail service standards are shown to have been downgraded in 5 zip code pairs and upgraded in 44 zip code pairs.
- e) Why is the Bridgeport facility not shown in the attachment to DBP/USPS-14?

RESPONSE

- (a) It is confirmed that 29 FCM pairs were upgraded and there were 29 ZIP Code pairs listed on the redacted Worksheet 7, so we are not sure what type of explanation you are seeking.
- (b) It is confirmed that 9 Priority pairs were upgraded. The blank Worksheet 7a was an error in the original submission. Worksheet 8 had the "No" box checked for "Negative Impacts" and it should be noted that Service Standard "Upgrades", as with the 9 Priority Upgrades implemented in this instance, are not usually considered "Negative Impacts"...only Downgrades are.
- (c) Not confirmed. There were 53 Downgrades and 212 Upgrades for Origin 066 in Package Services.
- (d) Confirmed.
- (e) The list depicts Function 1 facilities. Bridgeport is not such a facility.

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APWU/USPS-T2-76 The Greenburg facility AMP, submitted as part of N2006-1/5 shows a downgrade in service commitments for FCM and Priority mail for 1 zip code pair. Worksheet 8 indicates no changes in service commitments for other classes of mail. Please consult the USPS response provided to DBP/USPS-80 and confirm the following changes in service standards:

- a) Service standards for periodicals for 3-digit ZIP 156 were downgraded for 10 zip code pairs and upgraded for 17 zip code pairs.

- b) Service standards for standard mail for 3-digit ZIP 156 were downgraded for 27 zip code pairs and upgraded for 38 zip code pairs.

RESPONSE

(a&b) Confirmed.

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APWU/USPS-T2-77 The Waterbury AMP, submitted as part of N2006-1/5 shows no changes in service commitments due to the AMP. Please consult the USPS response provided to DBP/USPS-80 and confirm the following changes in service standards:

- a) Service standards for periodicals for 3-digit ZIP 067 were downgraded for 20 zip code pairs and upgraded for 1 zip code pair.
- b) Service standards for standard mail for 3-digit ZIP 067 were downgraded for 3 zip code pairs and upgraded for 33 zip code pairs.

RESPONSE

(a&b) Confirmed.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
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APWU/USPS-T2-78 How many of the 3-digit zip codes for offices either consolidated or scheduled for consolidation since December 2001 are not included in the EXFC sample? Please identify them.

RESPONSE

All 3-digit ZIP Code areas, whether in or out of the EXFC sample, are potential candidates for AMP review and consolidation, even if not all future AMP reviews have been scheduled. Attached is a list of the 3-digit ZIP Codes in the EXFC sample. To compile a list of 3-digit ZIP Codes subject to consolidations since 2004, consult USPS Library References N2006-1/5, N2006-1/6 and N2006-1/11. Comparing the two lists, you can determine which of the consolidated 3-digit ZIP Codes are not EXFC 3-digit ZIP Code areas.

ATTACHMENT TO RESPONSE TO APWU/USPS-T2-78

JANUARY 1- MARCH 31, 2006 (PQ II-FY 2006)

EXFC externally measures collection box to mailbox delivery performance. EXFC continuously tests a panel of 463 ZIP Code areas selected on the basis of geographic and volume density from which 90% of First-Class volume originates and 80% destinates. EXFC is not a system-wide Measurement of all First-Class Mail performance.

ALABAMA	350, 351, 352, 358, 361, 366
ALASKA	995, 996
ALBANY	120, 121, 122, 123, 128, 130, 131, 132, 135, 139
ALBUQUERQUE	870, 871
APPALACHIAN	240, 250, 251, 252, 253, 263, 264, 265
ARIZONA	850, 852, 853, 855, 856, 857
ARKANSAS	720, 721, 722, 723, 727
ATLANTA	300, 301, 302, 303
BALTIMORE	210, 211, 212, 214, 217, 219
BAY VALLEY	939, 945, 946, 947, 948, 950, 951
BIG SKY	590, 591, 598
BOSTON	021, 024
CAPITAL	200, 206, 207, 208, 209
CARIBBEAN	009
CENTRAL FLORIDA	327, 328, 329, 334
CENTRAL ILLINOIS	604, 605, 616, 617, 618, 627
CENTRAL NEW JERSEY	077, 085, 086, 088, 089
CENTRAL PENNSYLVANIA	170, 171, 172, 176, 178, 185, 187, 196
CENTRAL PLAINS	515, 516, 666, 670, 671, 672, 680, 681, 685
CHICAGO	606, 607
CINCINNATI	410, 436, 450, 451, 452, 454, 458, 470
COLORADO/WYOMING	800, 801, 802, 803, 809, 820
COLUMBUS	430, 431, 432, 433
CONNECTICUT	060, 061, 062, 064, 069
DAKOTAS	570, 571, 573, 581
DALLAS	750, 751, 752, 754, 757
DETROIT	481, 482, 492
ERIE	159, 161, 164, 165, 166
FORT WORTH	760, 761, 762, 764, 791, 794
GATEWAY	620, 622, 630, 631, 633, 652
GREATER INDIANA	460, 461, 462, 463, 464, 466, 468, 469, 473, 478, 479
GREATER MICHIGAN	486, 488, 489, 490, 493, 494, 495

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GREATER SOUTH CAROLINA	290, 291, 292, 293, 294, 295, 296
GREENSBORO	270, 271, 272, 273, 274, 275, 276, 277, 278, 286
HAWKEYE	500, 501, 502, 503, 507, 511, 520, 524, 612
HONOLULU	967, 968
HOUSTON	770, 772, 773, 774
KENTUCKIANA	400, 401, 402, 405, 406, 471, 477
LAKELAND	530, 531, 532, 535, 537, 543, 544, 549
LONG ISLAND	115, 117, 118, 119
LOS ANGELES	900, 902, 903, 904, 905
LOUISIANA	700, 701, 705, 708, 711
MAINE	040, 041, 043, 044, 045, 048
MASSACHUSETTS	010, 011, 012, 013, 015, 016, 017, 018, 019
MID-AMERICA	640, 641, 658, 661, 662
MID-CAROLINAS	280, 281, 282, 283, 288, 297
MISSISSIPPI	386, 390, 391, 392, 395
NEVADA-SIERRA	890, 891, 895
NEW HAMPSHIRE/ VERMONT	030, 031, 032, 033, 034, 038, 050, 054
NEW YORK	100, 104
NORTH FLORIDA	320, 321, 322, 323, 325, 326
NORTHERN ILLINOIS	600, 601, 602, 603, 611
NORTHERN NEW JERSEY	070, 071, 072, 073, 074, 075, 076, 078, 079
NORTHERN OHIO	440, 441, 442, 443, 445, 447, 449
NORTHERN VIRGINIA	201, 220, 221, 222, 223
NORTHLAND	540, 546, 550, 551, 553, 554, 559, 563
OKLAHOMA	730, 731, 740, 741, 743
PHILADELPHIA METRO	180, 189, 190, 191, 193, 194
PITTSBURGH	150, 151, 152, 153, 154, 156
PORTLAND	970, 971, 972, 973, 974, 986
RICHMOND	224, 225, 230, 231, 232, 233, 234, 235, 238
RIO GRANDE	765, 767, 780, 781, 782, 784, 786, 787, 788, 789, 797, 799
SOUTHEAST MICHIGAN	480, 483, 484, 485
SACRAMENTO	937, 952, 956, 957, 958
SALT LAKE CITY	840, 841, 844
SAN DIEGO	919, 920, 921, 924
SAN FRANCISCO	940, 941, 943, 944, 949
SANTA ANA	906, 907, 908, 917, 918, 926, 927, 928
SEATTLE	980, 981, 982, 984, 985
SOUTH FLORIDA	330, 331, 332, 333
SOUTH GEORGIA	309, 310, 312, 314, 319
SOUTH JERSEY	080, 081, 082, 083, 084, 197, 198
SOUTHEAST NEW ENGLAND	020, 023, 027, 028, 029

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SPOKANE	835, 837, 838, 990, 991, 992, 994
SUNCOAST	335, 336, 337, 338, 339, 341, 342, 346
TENNESSEE	370, 371, 372, 374, 379, 380, 381
TRIBORO	110, 112, 113, 114, 116
VAN NUYS	911, 913, 914, 915, 916, 930, 931, 933
WESTCHESTER	105, 106, 107, 108, 109, 125
WESTERN NEW YORK	140, 141, 142, 143, 144, 145, 146