

**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 T2-98-112)
(June 16, 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-T2-98

- a) Please confirm that the APWU was notified on April 7th that the Newark AMP, one of the 41 on the list attached to your testimony, has been approved.
- b) Please confirm that the Postal Service did not hold a town hall meeting to collect community and mailer input on the Newark AMP.
- c) Please confirm that at the end of May Representative Payne and Senator Lautenberg sent letters to Mr. Potter expressing their concerns about this AMP. Please tell us if those letter have been answered.
- d) Please confirm that on June 5th about 75 employees at the Newark facility were sent letters by the Postal Service informing them that they will be involuntarily reassigned out of their current postal facility.

APWU/USPS-T2-99

- a) Please provide a description and documentation of the steps the Postal Service took to collect public input related to the Newark AMP.
- b) Please provide a description of any input that was received and what the Postal Service's response was to that input.

APWU/USPS-T2-100 Please provide a copy of the notes that the Postal Service took during the town hall meetings on the Sioux City and Rockford AMPs. Please provide any list of action items resulting from those two town hall meetings.

APWU/USPS-T2-101 It has been reported that at the end of the town hall meeting held on June 5, 2006 to discuss the Rockford AMP, Mr. Galligan indicated that the Rockford AMP would be put on hold as the Postal Service had considerable work yet to do in considering the Rockford consolidation. Is this a correct interpretation of Mr. Galligan's remarks? If not, what commitment, if any, did Mr. Galligan make regarding the next step on the Rockford AMP?

APWU/USPS-T2-102 The USPS' response to OCA/USPS-44 (j) indicates that a headquarters employee may not be present at each of the town hall meetings referenced in the May 1st revision to your testimony. Please describe the authority the USPS representative at each of those town hall meetings will have to provide information requested by meeting participants and to commit the Postal Service to address concerns raised by the participants.

APWU/USPS-T2-103 Did the Postal Service organize the town hall meeting to discuss the Rockford AMP or was it organized by Representative Manzullo's office?

APWU/USPS-T2-104 Please detail the steps the Postal Service took to publicize the Rockford town hall meeting.

APWU/USPS-T2-105 Please list any specific invitations extended to mailers or community organizations to attend the Rockford town hall meeting.

APWU/USPS-T2-106 Please provide any Postal Service information packages available to the public in advance of the Rockford town hall meeting.

APWU/USPS-T2-107 Please provide any Postal Service information packages or handouts distributed at the Rockford town hall meeting.

APWU/USPS-T2-108 Please provide an example of any comment cards or similar items that were provided to the public at the Rockford town hall meeting for them to use to submit questions and concerns to the Postal Service.

APWU/USPS-T2-109 How were the four AMP summaries that are currently shown at <http://www.usps.com/all/amp.htm> chosen? Is it the Postal Service's intention that all proposed AMPs will be summarized here? What factors will decide the timing of the posting of those summaries?

APWU/USPS-T2-110 On any changes related to END, how can the public/ stakeholders find information on:

- a) whether postal installations in their area will be studied or considered for expansion/ consolidation or closure.
- b) the specifics of what will be studied by an AMP
- c) the timetable for the study;
- d) the reasons for conducting this specific study and goals of the study;
- e) benchmark points in the study process;
- f) preliminary study results;
- g) possible changes that would be considered based on study results;
- h) opportunities to comment on study results;
- i) how they can suggest alternative matters to study;
- j) how they can suggest that existing problems or service levels be evaluated to determine if they are exacerbated or ameliorated by any possible change;
- k) how the public can get a list of suggestions and comments submitted by the public for Postal Service consideration;
- l) how the public can add their thoughts on such suggestions and comments;
- m) how the public gets feedback on their suggestions;
- n) how the public and stakeholders are notified about any decisions regarding their suggestions;
- o) if the local post office or district rejects or fails to consider a suggestion or proposal, how does someone make sure their suggestion or proposal comes to someone's attention when the AMP is passed to higher levels for approval?

APWU/USPS-T2-111 What steps will the Postal Service take to publicize town hall meetings for discussion of each proposed AMP?

APWU/USPS-T2-112 Please clarify your responses to POSTCOM/USPS-T2-4 (c) and witness Shah's response to APWU/USPS-T1-26. If the Postal Customer Council's are one of the ways that the USPS communicates with mailers about changes in the mail processing environment, why are the PCC's not used to solicit input from mailers about the potential impact of AMPs? Will PCC's be used in the future as one of the points to collect input for AMP studies?