

**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 T2-75-78)
(May 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-T2-75 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?

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.

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:

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

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.