

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

EVOLUTIONARY NETWORK DEVELOPMENT  
SERVICE CHANGES, 2006

Docket No. N2006-1

REVISED RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE  
(OCA/USPS-21) [ERRATA]

The United States Postal Service hereby submits its revised response to the following interrogatory of the Office of the Consumer Advocate: OCA/USPS-21. The revised response supersedes the original response filed on April 10, 2006. The form of the response is corrected to indicate that the answer to subpart (c) also applies to subpart (d).

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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July 12, 2006

**RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORY  
OF THE OFFICE OF THE CONSUMER ADVOCATE**

**Revised: July 12, 2006**

**OCA/USPS-21.** Please refer to the sample timeline for completion of an AMP attached to the USPS Office of the Inspector General Audit Report in LR-N2006-1/8, Appendix A. In that timeline, no specific time period is indicated for input from interested groups within and without the USPS, government officials, or the public in general. Also, the USPS AMP Communication Plan in LR-N2006-1/4, page 5, provides only for USPS notice to various groups of a feasibility study but does not provide that the notice establish procedures to obtain input from those groups.

- a. Please indicate the specific points or time periods within the timeline when the USPS solicits input from each of the following groups: interested groups within the USPS, interested groups outside the USPS, government officials at federal, state, and local levels, and the public in general.
- b. If the time periods for soliciting and obtaining input from each of these four groups are not during the time period to "Complete AMP Study (0-6 Months)," please explain why not.
- c. Please indicate where on this timeline the USPS believes it has filed its request for an advisory report from the Postal Rate Commission pursuant to §3661 of the Postal Reorganization Act with respect to each of the studies in the group of 10 AMP reports included in LR-N2006-1/5 and the AMP study in LR-N2006-1/6.
- d. The Postal Service has submitted a proposal to this Commission pursuant to §3661 of the Postal Reorganization Act which will generally affect service on a nationwide or substantially nationwide basis.
  - i. Please state the effective date of such proposal.
  - ii. Is it the position of the Postal Service that the proposal in this case was filed "within a reasonable time prior to the effective date of such proposal?" Please explain your answer.

**RESPONSE**

- a. To date, the Postal Service receives, but does not solicit direct input from the general public and interested groups within the USPS. Input is received from elected officials who are contacted by the Postal Service and who act on behalf of the public at all stages of review.
- b. To date, formal solicitation of such comments is not a part of the AMP process.
- c-d In February 2006, the Board of Governors of the United States Postal Service authorized the Postal Service to request an advisory opinion under §3661 in

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**RESPONSE to OCA/USPS-21 (continued)**

conjunction with a directive that, as early as the middle of May 2006, the Postal Service begin to implement a centrally-directed plan for nationwide operational consolidation in pursuit of the objectives of the Evolutionary Network Development initiative. The Marina AMP reflected in USPS Library Reference N2006-1/6 was proposed by the Pacific Area as a consolidation opportunity in 2004 and the study was completed in early 2005. As explained in the testimony of witness Williams (USPS-T-2) and elsewhere, when it appeared in 2005 that postal management might take its plans to conduct a centrally-directed nationwide consolidation program – Evolutionary Network Development -- to the Board of Governors for authorization, other smaller locally developed consolidation proposals that had been put on hold pending development of the END initiative were permitted to complete the AMP review process. These proposals were not developed as part of the centrally-directed END initiative, but were proposed locally and independently of it. Unlike the Marina AMP and unlike the six AMPs referenced in response to DBP/USPS-6, what these 10 proposals had in common was that they had been put on hold while the Postal Service determined if, when and how to proceed with its national END strategy. Whether or not the Board of Governors approved the pursuit of END in February 2006 does not affect that character of the 11 isolated AMP proposals that were implemented in 2005 or the six that were implemented in 2004. Each found its way to Headquarters under the AMP Guidelines in the Handbook PO-408, which has served as a vessel for consideration of

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**RESPONSE to OCA/USPS-21 (continued)**

locally developed consolidations plans in one form or another for decades. Such isolated, locally developed plans are not subject to 3661 review.

By operation of PRC Rule 72, no changes in service that result from the decision to pursue END can be implemented less than 90 days after February 14, 2006. The Postal Service plans to implement no changes before May 15, 2006. Within the meaning of the Rule, the Postal Service considers that its Request was filed a reasonable time before May 15, 2006.