

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

EVOLUTIONARY NETWORK DEVELOPMENT
SERVICE CHANGES, 2006

Docket No. N2006-1

REPLY OF THE UNITED STATES POSTAL SERVICE
TO MOTION TO COMPEL A RESPONSE TO DAVID POPKIN
INTERROGATORY DBP/USPS-90
(July 31, 2006)

The United States Postal Service hereby submits its reply to the July 24, 2006 motion of David Popkin seeking to compel a response to DBP/USPS-90.

Mr. Popkin argues that, in some way, the Commission's review of the potentially substantially nationwide service changes resulting from Evolutionary Network Development and whether they would conform to the policies of the Act hinges on whether the consolidation of originating operations at the Newark NJ P&DC will lead to a determination to change the salary level assigned to the position of Postmaster in Newark NJ. He argues that the Newark NJ AMP study (USPS- Library Reference N2006-1/14) took into account changes in aggregate costs associated with craft and EAS employees. From this, he leaps to the conclusion "it is just as relevant" to know whether the salary level of the Postmaster will change as a result of the consolidation. He even argues that, if the incumbent Postmaster's job is reclassified, but the salary does not change because of a "saved pay" determination, a change in the salary level assigned to the position is relevant. However, he fails to identify or articulate any issue in this docket to which such information would be relevant or material.

The requested information is patently irrelevant to the issue of whether the potential service changes resulting from END would conform to the policies of the Postal Reorganization Act. Questions seeking to explore whether an incumbent Postmaster's salary stays the same, or whether it changes, or whether it would change if the position were filled by another individual lack any nexus to the material issues in this proceeding.

Mr. Popkin's analogy to craft and EAS cost savings information in the Newark NJ AMP decision package is inapt. Those savings estimates are not based on assessments of changes in the salary levels for specific categories of craft or EAS employees before and after a consolidation. The savings estimates reflect the impact of the transfer or elimination of positions from the Newark NJ P&DC. By way of comparison, the AMP package for the Marina CA P&DC (USPS Library Reference N2006-1/6, Worksheet 6) identifies as a cost factor the loss of the Plant Manager position resulting from the closure of that facility. There is no similar position loss or associated salary cost savings recorded as part of the Newark NJ AMP package, or the \$3.9 million in cost savings associated with planned consolidation. That level of information should be sufficient for purposes of the instant docket, not whether the salary level associated with the position of Newark Postmaster changes is subject to change.

This interrogatory is one step away from seeking to know whether the parking space assigned to the Newark Postmaster will remain the same size, or whether it will change when a successor is appointed.

For these reasons, the motion to compel a response to DBP/USPS-90 should be denied.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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