

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

MAIL PROCESSING NETWORK RATIONALIZATION
SERVICE CHANGES, 2011

Docket No. N2012-1

**RESPONSES OF UNITED STATES POSTAL SERVICE
WITNESS DAVID WILLIAMS
TO AMERICAN POSTAL WORKERS UNION INTERROGATORIES
(APWU/USPS-T1-5 and 7)**

The United States Postal Service hereby files the responses of witness David William to the above-listed interrogatories of the American Postal Workers Union dated December 29, 2011. Each interrogatory is stated verbatim and followed by the response. Interrogatory APWU/USPS-T1-6 has been redirected to the Postal Service which will file an institutional response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Anthony F. Alverno, Jr.
Chief Counsel, Global Business

Michael T. Tidwell

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2998; Fax -5402
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**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS WILLIAMS
TO AMERICAN POSTAL WORKERS UNION INTERROGATORY**

APWU/USPS-T1-5 On page 5 of your testimony you state that the “objective of the modeling exercise was to determine whether excess capacity could be reduced significantly within the network if service obligations and operating constraints driven by current overnight First-Class Mail service standards were changed.”

- (a) Did the Postal Service consider any other objectives in lieu of changing the current overnight service standards for First-Class Mail as a means of reducing excess capacity?
- (b) If so, please identify alternative objectives and explain why those alternatives were not chosen.
- (c) If not, please explain why the Postal Service did not examine possible alternatives that would preserve overnight First-Class Mail service standards.

RESPONSE

- a-c. See the response to GCA/USPS-T1-1. The goal was to substantially change cost curve, in light of volume trends, which could not be done without changes to service standards to some degree.

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

APWU/USPS-T1-7 Please define “associated customer service facilities” as used in Footnote 8 on page 10 of your testimony.

RESPONSE

The designation of Customer Service Mail Processing Facility (CSMPC) refers to a Post Office, station, branch, or associate office that uses automated and/or mechanized mail processing equipment to perform originating and/or destinating Sectional Center Facility processing.