

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

EVOLUTIONARY NETWORK DEVELOPMENT
SERVICE CHANGES, 2006

Docket No. N2006-1

OBJECTIONS OF THE UNITED STATES POSTAL SERVICE
TO APWU INTERROGATORIES APWU/USPS-T2-1(a,f,g,h) 3(b), 6(k), AND 8
(February 23, 2006)

The United States Postal Service hereby submits objections to the following interrogatories of the American Postal Workers Union, AFL-CIO, filed on February 17, 2006: APWU/USPS-T2-1(a,f,g,h), 3(b), 6(k), and 8.

APWU/USPS-T2-1(a,f,g,h)

The Postal Service objects to subpart (a) of this interrogatory, insofar as it requests two items of information in reference to the 24 AMP studies referenced at page 8 of USPS-T-2. It is irrelevant to this proceeding who within the Postal Service requested that the studies be initiated. The date on which the studies were initiated is equally irrelevant. There is no issue in the current docket or aspect of the requested advisory opinion on which such information could possibly have any material bearing. Accordingly, the Postal Service objects to providing such information.

Subpart (f) of this interrogatory requests that the Postal Service list all Area Mail Processing studies begun since December 31, 2001. The Postal Service objects to the interrogatory on the grounds of relevance. The Postal Service plans to use procedures outlined in its Area Mail Processing Guidelines (USPS Handbook PO-408) to make network realignment decisions in the next several years that are expected to result in

different service standards being applied to various 3-digit ZIP Code origin-destination pairs. The request in this proceeding seeks an advisory opinion from the Postal Rate Commission regarding whether such changes in service pursuit of the objectives of Evolutionary Network Development would conform to the policies of the Postal Reorganization Act. It is irrelevant to the issues raised by the instant request whether and where the AMP guidelines may have utilized to consider making operational changes elsewhere in the postal network since the beginning of 2002.

Subpart (g) refers to any post-2001 AMP studies that may have been completed, but which were not among the 10 (reflected in USPS Library Reference N2006-1/5) chosen for testing of an acceleration of the AMP review process in anticipation of a national roll-out of the Postal Service's Evolutionary Network Development strategy. The interrogatory requests that the Postal Service "present a report" regarding any such post -2001 studies in which:

- the location (affected facilities) and other identifying information are redacted;
- identifying letters are assigned mask facility identities; and
- ZIP Codes are assigned numerical identifiers.

In conjunction with these chores, subpart (h) then requests that the Postal Service:

- provide each facility's total mail volume;
- disaggregate that volume on a mail class specific basis;
- provide, on a mail processing operation-specific basis, the originating and/or destinating volume of mail by class or service "where appropriate"; and
- disaggregate this volume on a point-to-point basis (3-digit ZIP Code area to 3-digit ZIP Code area)

The Postal Service objects on two grounds.

First, the information identified in all seven bullets is irrelevant to the request in the instant docket. Studies that may have been completed in the past four years (i.e., approved or disapproved at Headquarters) in pursuit of objectives unrelated to Evolutionary Network Development have no material bearing to the issues raised by the request in this docket. Granted, there are parties in the instant docket whose relationships to the Postal Service may cause them to have agendas that are not confined to the narrow purposes of 39 U.S.C. § 3661. However, whatever those agendas may be, these parties should not expect to be able to utilize Docket No. N2006-1 discovery as a vehicle for pursuit of those other agendas. Within the context of this proceeding, the Postal Service should not bear the undue burden of providing information that has no bearing on the advisory opinion that has been requested.

In addition, the Postal Service considers the mail class-specific volume information requested in the final two bullets to be privileged because of its commercially sensitive and proprietary nature. Such information, if publicly disclosed, could be used by competitors involved in the business of transmitting and delivering otherwise mailable matter to gain a valuable and unfair competitive advantage, to the economic detriment of the Postal Service *and its employees*.

APWU/USPS-T2-3(b)

The Postal Service objects to this interrogatory, to the extent that it seeks to impose upon the Postal Service an obligation to report to the Commission each time a milestone is reached in the path toward completion of the implementation of any given AMP decision, or to keep a log indicating how many days it has taken or may take to

reach each and every milestone. There are 10 AMP projects currently being implemented, with the expectation that all will be completed by the end of June 2006. 41 more facilities are presently being studied. If realignment decisions result, each will be subject to its own implementation timetables and milestones. More studies will follow. Certain parties to this proceeding, by virtue of their status as collective bargaining representatives for different groups of postal employees, have an interest in matters related to Evolutionary Network Development that exceeds the scope and purpose of this docket. Those parties should not be permitted to use discovery in this case to pursue matters that are not material to the Commission's responsibilities under § 3661. And, in the context of this proceeding, the Postal Service should not bear the burden of providing daily updates whenever implementation of one local AMP decision or another reaches a particular intermediate milestone.

APWU/USPS-T2-6(k)

This interrogatory requests an explanation for the redactions made to copies of Worksheet 7 for various AMP decision packages contained in USPS Library Reference N006-1/5. The Postal Service objects to this interrogatory, insofar as it requests the statement of a legal conclusion beyond that provided in the preface page (immediately following the cover page) of the Library Reference. APWU's attention also is invited to the final paragraph of the Postal Service's objection to DBP/USPS-T2-6(k) above.

APWU/USPS-T2-8

This interrogatory requests copies of the "internal and external support kits" for prepared by the Postal Service for the communication of AMP study announcements and AMP implementation announcements. The kits are designed to ensure consistent

and accurate transmission of information to postal employees (internally) and to the public (externally). The Postal Service objects to the disclosure of the kits for reasons similar to those discussed above in reference to APWU/USPS-T2-3(b). The request in this proceeding seeks an advisory opinion from the Postal Rate Commission regarding whether changes in service pursuant to the objectives of Evolutionary Network Development would conform to the policies of the Postal Reorganization Act. By filing USPS Library Reference N2006-1/4, the Postal Service has provided information regarding how it intends to notify affected mailers, either directly or through local print and broadcast media outlets, and how it intends to notify local and Federal government officials.

The external communications kit consists of a compilation of templates and background information for use by local postal personnel responsible for the generation of letters, press releases, etc., pertinent to their Districts. The kit is used for the purpose of ensuring consistency and accuracy in the dissemination of information regarding the local announcement of AMP studies and decisions. The internal kit has a similar purpose for use in disseminating general information -- to postal employees affected by an AMP study or an AMP decision -- through the Postal Service's internal channels (intranet messaging, bulletin board postings, stand-up talks, etc.).

These kits and the instructions for their use have no material bearing on any issue raised by the request in this docket. There is no aspect of the advisory opinion requested in this proceeding to which such internal postal administrative communications instructions could have any bearing. Parties who have interests in matters related to the consequences of Evolutionary Network Development that are

beyond the scope of and purpose of this docket should not be permitted to use discovery in this case to pursue matters that are not material to the Commission's responsibilities under § 3661. Accordingly, the Postal Service objects to disclosure of the requested communications kits.

The Communications Plan is a matter of record in this proceeding. Its end-product consists of documents that make their way into the public domain. In the spirit of APWU/USPS-T2-8, the Postal Service will respond to this interrogatory by providing examples of public communications produced in conjunction with at least one of the 10 AMP decisions identified in USPS Library Reference N2006-1/5.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux
Chief Counsel, Ratemaking

Michael T. Tidwell

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2998; Fax -5402
February 23, 2006