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

POSTAL RATE AND FEE CHANGES PURSUANT TO PUBLIC LAW 108-18	Docket No. R2005–1

UNITED STATES POSTAL SERVICE REPLY IN OPPOSITION TO
AMERICAN POSTAL WORKERS UNION MOTION TO COMPEL RESPONSES TO
INTERROGATORIES APWU/USPS-T2-1(a,f,g,h), 3(b), 6(k), and 8
(March 7, 2006)

The United States Postal Service hereby responds to the February 28, 2006, motion of the American Postal Workers Union, AFL-CIO (hereinafter, APWU) seeking to compel answers to the following interrogatories: APWU/USPS-T2-1(a,f,g,h), 3(b), 6(k) and 8. For the reasons explained below, the motion should be denied.

APWU/USPS-T2-1

At issue in this proceeding is whether changes in the application of current service standard definitions to numerous 3-digit ZIP Code pairs -- that are expected to result from potentially nationwide operational changes implemented in pursuit of the Postal Service's Evolutionary Network Development (END) strategy -- would conform to the policies of the Postal Reorganization Act. As is clear from the testimony of witness Williams (USPS-T-2), the Postal Service plans to use outputs from its END model to assist in the development of proposals for the consolidation of mail processing and transportation operations at facilities throughout the mail processing network. Each local proposal then will be subjected to a centrally directed application of the Postal Service's Area Mail Processing (AMP) review procedures (USPS Library Reference N2006-1/3) for the purpose of determining its feasibility.

Witness Williams' testimony explains that the AMP process has been in place for some time for the local initiation of AMP proposals that eventually make their way to Headquarters for decision and if, approved, implementation. USPS-T-2 at 2**.** Before the Postal Service decided to embark on the instant plan to centrally direct and accelerate the systemwide review of operational changes that cumulatively have potentially nationwide service change implications, the Postal Service began development of the END model discussed by witness Shah (USPS-T-1) to aid in this undertaking. As further explained by witness Williams, during the several years of development and refinement of this model, about two dozen locally developed initiatives to consolidate various mail processing and transportation operations were generated in the field for consideration; however, a general moratorium on the review and approval of operational consolidations was imposed until proposals could be evaluated in light of what might be suggested by the END model. USPS-T-2 at 8. With the END model developed, the Postal Service decided in 2005 to test it ability to manage a centralized and accelerated AMP review process, by directing that 10 of these 24 local AMP proposals be placed back on the front burner, reviewed and, if approved, implemented. *Id*. at 9. During 2005, the Postal Service initiated development of its plan for a national roll-out of a centrally directed and accelerated application of the AMP review process to its entire network. That plan is the subject of this proceeding. As indicated by the Attachment to USPS-T-2, approximately 40 AMP studies are underway and will be followed by successive waves of studies as the entire network is reviewed over the next several years.

APWU/USPS-T2-1(a)

Subpart (a) of this interrogatory seeks to explore matters that are irrelevant and immaterial to the issues raised by the request in this proceeding. It is irrelevant to the issues raised by the request in this docket which facilities were among the 24 facilities for which AMP studies were initiated but put on hold, pending the development of the END model. It is equally irrelevant who within the Postal Service may have initially proposed that these facilities be subjected to review. Some of the 24 facilities subject studies that were put on hold during development of the END model are among the 10 facilities for which studies were ultimately completed, reviewed and approved in October 2005, and compiled in USPS Library Reference N2005-1/5. Some of the facilities are among those listed in the Attachment to USPS-T-2.[1]

At page 10 of its motion to compel, APWU raises the shopworn canard that "[t]he fact that the Postal Service has taken the trouble to interpose objections to revealing such information bespeaks a desire not to reveal the full genesis of its Request." To the contrary, the Postal Service has taken the trouble because the requested information is irrelevant and because the Postal Service hopes to be a constructive force in keeping the litigation of this docket focused on matters that are relevant and material to the issuance of an advisory opinion in response to its request.[2]

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[1] And, since the entire mail processing network is potentially subject to AMP review as part of the Postal Service's END strategy, it is safe to presume that the remainder of the facilities whose studies were put on hold will one day be queued up for new AMP studies.

[2] In the same vein at page 11, the APWU implies that the Postal Service is engaged in an effort to "deny the evolution" of its Network Integration & Alignment strategy to END. This is an odd accusation to make, given the Postal Service's decision to accompany its request in this proceeding with a copy of the General Accountability Office audit report that discusses the development that strategy. *See* USPS Library Reference N2006-1/XX at 53.

At pages 11-12 of its motion, APWU argues that ”[i]f, as it seems clear, all or nearly all of the studies performed since 2001 have been subjected to review under . . . END, the results and effects of these studies remain relevant.” In this regard, the Postal Service emphasizes that, for the duration of this litigation, it expects to report the *results* and *effects* of completed studies – that is, studies that make it all the way through AMP process in pursuit of the goals of END – much in the same manner as is reflected in USPS Library Reference N2006-1/5. However, the dispute around APWU/USPS-T2-1(a) has nothing to do with the *results* and *effects* of completed studies. The interrogatory, for some inexplicable reason, demands to know the *names* of individuals who may have once proposed that particular facilities be subjected to the AMP review process before the Postal Service decided to embark on the plan under review in this docket. And it demands to know the identities of facilities for which AMP studies were *proposed but put on hold* as the Postal Service developed and refined its END strategy.

A very clear-cut approach for the Commission to assess the relevance of the information being withheld in response to this interrogatory is to ask itself whether it is relevant to the advisory opinion that has been requested for it to know:

(1) whether Facility A or Facility Z were ever proposed as candidates for AMP review before the Postal Service put a general freeze on AMP decisions while developing its END strategy and the processes to be employed in pursuit of that strategy; and

(2) who within the Postal Service made such proposals.

Viewed in this manner, it becomes clear that the only information sought by APWU/USPS-T2-1(a) t hat the Postal Service has objected to disclosing is information that the Postal Service should not be compelled to disclose.

Subparts (f-h)

For many of the same reasons, the Postal Service objected to APWU/USPS-T2-1(f). This interrogatory seeks a list of all AMP feasibility studies begun since the end of December 2001. Subparts (g) and (h) of this interrogatory propose a method for disclosing information from those studies.[3]

By definition, such a list would exclude any post-2001/non-N2006-1 AMP decisions not part of the current centrally directed and accelerated program for operational review that has the potential to produce service changes on a cumulative basis sufficient to trigger the request in this proceeding. Accordingly, such studies are – by definition – irrelevant to this docket and would pertain to isolated, localized network changes and any service changes that may have resulted.

At page 11 of it Motion to Compel, APWU argues that it is entitled to the requested information because the Postal Service's END strategy has been in development for five years. APWU further argues at pages 11-12 that the Commission must have access to any such studies not part of the END initiative under review in this docket because it:

> is presented with the alternatives of accepting presentation of only the 10 AMP studies selected by the USPS for presentation, with substantial data redacted, or reviewing data from other AMPs performed since 2001 to see what they reveal about the impact of the process on postal service and costs. The use of older

[3] The Postal Service interprets these interrogatories as requesting study results that are reflected in a final agency decision, but not among those already disclosed in USPS Library References N2006-1/5.

> AMP reports helps in assessing the types of *actual* changes that take place as opposed to changes that are merely estimated from the model.

The APWU's argument is flawed in several ways. First, it implicitly asserts that the Postal Service has offered the 10 AMP studies in USPS Library Reference N2006-1/5 as representative of the *results* that can be expected when hundreds of other mail processing plants are subjected to the same process over the next several years. That is simply not the case. As witness Williams explicitly emphasizes at page 10 of USPS-T-2 that the expected *results* of the first 10 AMP studies are *not* intended to be representative of all changes that will occur as a result of upcoming AMP studies. The ten decision packages were provided in USPS Library Reference N2006-1/5 because they represent how the centralized and accelerated AMP review *process* is expected to be conducted as the Postal Service pursues the objectives of its END strategy. While many upcoming operational reviews conducted in pursuit of those same objectives will have issues in common, local factors make each feasibility study unique. In fact, in fn. 4 at page 10 of USPS-T-2, to reinforce the point that the first 10 AMP decisions do not reflect the full range of potential operational outcomes, witness Williams deliberately refers to the Marina AMP decision, which pre-dated the centralized and accelerated process now under review and which was the subject of Docket No. C2005-2. The Marina AMP decision illustrates that consolidations of originating operations that result in service upgrades (which are the predominant impact of nine of the 10 studies in Library Reference N2006-1/5) are not the only types of outcomes of the AMP review process. As revealed in USPS Library Reference N2006-1/6, in the case of Marina, both originating and destinating operations can be consolidated, and there can be service upgrades *and* downgrades for multiple ZIP Code pairs as a result of a particular

AMP review. *See also*, Docket No. C2005-2, Declaration of Robert W. Field (May 17, 2005).[4]

Second, subparts (f-h) of APWU/USPS-T2-1 appear to be premised upon some confusion about the role of the END model in the AMP process. APWU argues at page 12 of its motion that its information request is premised upon the notion that the use of older AMP reports helps in assessing the types of *actual* changes that take place as opposed to changes that are merely estimated from the END model. However, as explained by witness Shah (USPS-T-1 at 10), multiple alternative operational consolidation outcomes can be suggested by the END model and then taken into consideration, along with other information, in the iterative process though which Headquarters and the Area and District offices develop a single proposed operational consolidation plan that then becomes the subject of the AMP feasibility study. From the initial District AMP study through the Area office and Headquarters reviews, any given AMP consolidation proposal may be modified before the final analysis and a final decision is made to approve or disapprove. Ultimately, when the "plan vs. reality" post-implementation review takes place, the Postal Service conducts an analysis to assess whether the particular operational changes identified in the final agency decision have been effectively implemented and the cost impacts assumed for the changes in that particular approved AMP plan have been realized. USPS-T-2 at 7.

Thus, if APWU's objective, in asking for the information described in APWU/USPS-T2-1(f-h) is to study differences between AMP plans that the Postal

[4] Thus, given the information provided in reference to the Marina AMP decision, there are grounds for concluding that the information sought by APWU/USPS-T2-1(f-h) is cumulative.

Service decides to implement and the actual outcomes resulting from implementation, as revealed by post-implementation review, it has requested documents that cannot be used to accomplish that task -- or it has some other unstated purpose in mind. The only documents that could provide a basis for the analysis that APWU claims to want to undertake are post-implementation review documents, which it has not requested.

Subparts (g) and (h) of APWU/USPS-T2-1 direct the Postal Service to mask the identities of any facilities identified in response to subpart (f) for which AMP studies may have been conducted since 2001 and to otherwise disclose the disaggregated operation-specific and facility-specific volume data that the Postal Service considers to be commercially sensitive and has redacted from the copies of AMP studies contained in Library References N2005-1/5 and 6. In addition to the reasons explained above in reference to subpart (f), the Postal Service should not be required to undertake the laborious task requested by the APWU in subparts (g) and (h) for the reasons explained below.

The Postal Service appreciates the APWU's demonstration of sensitivity for the Postal Service's commercial interests in proposing a format for protecting those interests, as reflected in subparts(g) and (h) of interrogatory APWU/USPS-T2-1. However, APWU's sensitivity to the Postal Service's concerns about the public disclosure of commercially-sensitive volume data from AMP decisions studies appears to have lasted only until APWU filed its motion to compel. In that motion, APWU now asserts that the Postal Service should be required to publicly disclose all data from each Worksheet 4 and each Worksheet 7 for each of the AMP decision packages identified in response to APWU/USPS-T2-1(f).

An examination of any of the Worksheets 4 in USPS Library Reference N2006-1/5 would be illustrative for purposes of the following discussion. Accordingly, the Postal Service invites the Commission's attention to pages 6-9 of the Library Reference. On those pages, columns (1), (6), (11) and (16) indicate mail processing operations (MODS) codes. The remaining columns are self-explanatory operation-specific volumes and cost estimates. The Postal Service has redacted the disaggregated, operation–specific volume, workhour, and cost numbers in each column, leaving the aggregate volume, workhour and cost figures for each facility on display. While this approach does not disclose operation-specific volumes and costs for each facility, it clearly reveals how the aggregate volume and cost figures at the bottom of each Worksheet 4 are derived.

The first question to be resolved by the Commission in response to APWU/USPS-T2-1(f-h) is whether, in light of the data actually disclosed, the redacted Worksheet 4 data are relevant and necessary to its role in providing advice under § 3661. In doing so, the Commission must declare whether its responsibilities in advising on the service changes that may result from implementation of AMP decisions in pursuit of END include a review of cost estimates at the operation-specific level for each facility that will ultimately be subjected to the AMP process in pursuit of the objectives of END.

The Commission's responsibilities certainly include understanding the nature of the cost analysis that the Postal Service employs as part of the AMP process. And, the Postal Service submits that this is easily obtained from a reading of the Handbook PO-408 (USPS-LR-N2006-1/3) and a cursory examination of the redacted copies of Worksheets 4 provided in USPS Library Reference N2006-1/5. Accordingly, with all

due respect to the Commission, the Postal Service considers that it is it is not necessary to the § 3661 process for this case to become bogged down by an examination of each operation at each facility in order to explore and assess the projected cost of shifting each of those specific operations from Plant A to Plant B. In any event, such information, insofar as it pertains to post-2001 AMP studies that are not part of the END strategy, such as is requested by APWU/USPS-T2-1(f-h), have no relevance to this docket. Whatever APWU's interest in this information may be, APWU has failed to connect it in any fashion to the issues in this case.

The same applies to APWU/USPS-T2-1(f-h), insofar as it seeks any disaggregated 3-digit ZIP Code-specific Worksheet 7 volume data contained in any such post-2001/non-2006-1 AMP decision packages. For purposes of this discussion, the Postal Service invites the Commission's attention to the first Worksheet 7 in USPS Library Reference N2006-1/5 – pages 12 and 13. For the AMP in question, the redacted worksheet shows the affected 3-digit ZIP Code pairs and the aggregate average daily mail volume expected to experience either a downgrade or an upgrade in service when this particular AMP plan is implemented. The redactions protect from disclosure the volumes for specific ZIP Code pairs. In this particular case, the only affected mail class is First-Class Mail. In other cases, additional mail classes are involved and similarly reported.

As with the Worksheet 4 redactions, the question to be resolved by the Commission in response to APWU/USPS-T2-1(f-h) is whether the redacted Worksheet 7 data from any post-2001/non-N2006-1 AMP decision packages are relevant and necessary to its role in providing advice under § 3661 in response to the Postal

Service's request. In doing so, the Commission must declare whether its responsibilities in advising on the service changes that may result from implementation of AMP decisions in pursuit of END require an examination that extends beyond an identification of affected ZIP Codes and estimates of total upgraded/downgraded mail volume on a class-by-class basis expected to result from each AMP decision.

It is the Postal Service's view that the Commission's responsibilities certainly include understanding the nature of the aggregate service impacts that could result from each AMP decision and a systemwide application of the AMP process that the Postal Service will employ in pursuit of END. Given that aggregate systemwide mail class impacts cannot be known until there is a substantial roll-out of the AMP process, the assessment of whether potential service changes would conform to the policies of the Act hinges on fairly general information regarding the nature of the service changes and their potential scope, which can be obtained by examining the information already provided in support of the Postal Service's request.

Again, with all due respect to the Commission, the Postal Service submits that when a listing of affected ZIP Code pairs are provided and AMP-by-AMP volume data by class are disclosed, as reflected in the above-referenced Worksheet 7, such information is sufficient for the purposes of the § 3661 review process, and it is irrelevant to this proceeding what the estimated volume impact may be for any particular 3-digit ZIP Code pair by mail class. Moreover, such information, insofar as it pertains to post-2001/non-N2006-1, as requested by APWU/USPS-T2-1(f-h), are beyond the scope of this proceeding.

The Commission and the parties have been down this same path before, in the only proceeding which bears some relation to the instant case. In Docket No. N89-1, the Commission was faced with a discovery dispute for data of the sort requested by APWU here, that the Postal Service regarded as commercially sensitive. In that instance, the Commission determined that:

> the crux of the . . . [discovery] request is to learn what these data represent, and to see how they would be used by managers to implement the service realignment plan. Thus, it should make no difference if actual blind city data or hypothetical data are provided so long as they are representative of the results that the Service might reasonably expect to experience at a facility . . . .

Docket No. N89-1, Presiding Officer's Ruling No. N89-1/9 at 4-5. The wisdom of this approach has not diminished with time. If APWU seeks the data from post-2001/pre-N2006-1 AMP studies to determine how the requested data were used by postal management in AMP studies outside the context of the goals of the END initiative, then the APWU should be directed by the Commission to make use of the *hypothetical* data that are provided in the sample Worksheet 4 in the Handbook PO-408 that has been filed as USPS Library Reference N2006-1/3. The Postal Service cautions that local variables make each AMP study unique. The hypothetical Worksheet 4 data in the Handbook PO-408 provide a very useful illustration of how facility-specific operational volume and cost data are utilized in the AMP review process. If APWU's interest in post-2001/pre-N2006-1 AMP volume and cost analysis is for the purpose of determining how such analysis compares between the pre- and post-END AMP processes, APWU is can rely upon the fact that the Handbook PO-408 AMP review procedures adopted in 1995 have not changed as a result of END. The only change has been in the use of an additional tool – END model outputs – as a variable in determining the nature of the

local operational consolidation proposal that will then be subjected to the Handbook PO-408 AMP review process.

The Postal Service concedes that no comparable hypothetical 3-digit ZIP Code-specific data are reflected in the sample Worksheet 7 contained in the Handbook PO-408. If, however, the purpose of the APWU's request is to see how such data have been used in the AMP process before, it is noteworthy that END has no bearing on AMP Worksheet 7 analysis. Referring back, for illustrative purposes again, to pages 13-14 of USPS Library Reference N206-1/5, the Worksheets there identify the affected ZIP Code pairs and the cumulative (for all affected ZIP Code pairs) Origin-Destination Information System volumes for the overnight/2-day changes and the 2-day/3-day First-Class Mail changes. If the Commission deems hypothetical disaggregated (point-to-point) figures to be acceptable for APWU's understanding of how the aggregate figures at the bottom of that Worksheet 7 are derived, then any hypothetical pair of point-to-point ODIS figures that add up to 2,500 can be inserted at the top of columns 4 and 5 on page 12 of USPS Library Reference N2006-1/5. Likewise, any pair of hypothetical figures that add up to 500 can be inserted at the top of page 13 in columns 4 and 5.

The Postal Service considers that the approach described above, which is founded on Commission precedent, can be utilized to resolve the discovery dispute at issue here.

A significant number of the Worksheet 4 MODS codes identify operations that are specific to particular mail classes: Express Mail, Priority Mail, First-Class Mail, Periodicals, Standard Mail and Package Services. This means that public disclosure of the volumes specific to those operations (or cost figures from which those volume

estimates could be deduced) would reveal those volumes to postal competitors who could utilize the figures to unfairly gain competitive advantage to the economic detriment of the Postal Service. Should the Commission conclude that access to the post-2001 AMP studies identified in APWU/USPS-T21-(f) that are not a part of the END initiative are relevant to this proceeding and that parties should have unrestricted access to the above-referenced operations-specific Worksheet 4 volume and cost data, and the mail class by ZIP Code pair-specific Worksheet 7 volume data, as requested by APWU, then the Postal Service respectfully requests that it notified and given seven days to propose and further justify the application protective conditions for such data to protect is commercial and competitive interests.

APWU/USPS-T2-3(b)

For the 10 AMP decisions reflected in USPS Library Reference N2006-1/5, APWU requests that the Postal Service produce a timeline indicating:

(a) the amount of time taken for each stage or phase of each AMP decision or its implementation;

(b) the current stage of implementation for each AMP decision; and

(c) the date between now and June 30, 2006, by which the implementation of each AMP decision is expected to be completed.

The Postal Service should not be burdened with such an undertaking for several reasons. First is the fact that such information is irrelevant to and has no material bearing on the Commission's advisory role under § 3661.

It is a matter of record in this proceeding that the decisions to implement the 10 AMP proposals in question were made during October 2005 and that, depending on their complexity, could take as long as June 30, 2006 to complete. USPS-T-2 at 9. As

indicated at page 16 of the APWU motion, the Postal Service has emphasized that "an understanding of the process by which it intends to realign its network and to implement service changes is fundamental to the Commission's role under § 3661." Accordingly, the AMP decision-making, implementation, and post-implementation review processes are explained in USPS-T-2 and in the USPS Handbook PO-408 (USPS-LR-N2006-1/3). However, APWU's argument in support of its motion to compel a response to this interrogatory confuses an *explanation of these processes* with an *obligation to provide daily timelines and status reports*.

Contrary to the assertion at page 17 of the APWU motion, how many days it took to complete each task reflected in the Handbook PO-408 Worksheets for each AMP proposals at the District level, or as part of the Area and Headquarters reviews, for each of the 10 instances documented in USPS Library Reference N2006-1/5, is not relevant to the issues to be resolved by the Commission in this docket. Even assuming that such timelines could be compiled by interrogating each employee who worked on each element of each AMP analysis and decision at each level of agency review, it should be sufficient for purposes of this proceeding for APWU to reference the signature page for each of the 10 AMP decision packages in Library Reference N2006-1/5. Those signature pages indicate the date on which the local, Area, and Headquarters reviews were completed for each AMP. *See, e.g*. USPS Library Reference N2006-1/5 at pages 3, 23 and 45.

With respect to implementation of the 10 AMP decisions, Postal Service headquarters is currently informed that personnel changes, equipment changes and mail movement has been completed for six of the 10. With each passing day,

implementation of the remaining four projects progresses toward completion. There are a variety of tasks related to personnel assignments, or equipment relocations, or movement of mail, or changes in operations and transportation at the “losing” and ”gaining” facilities, and changes in the service standards database, that are a part of the implementation of each AMP decision.

The specific dates on which these and other tasks have been or will be completed for these ten AMP decisions have no bearing on the issues about which the Commission must opine under § 3661. The Postal Service should not be burdened in this proceeding by an obligation to file revised and/or supplemental responses to this interrogatory in order to inform the record each and every time there is a change in status for some component of the implementation of a particular AMP decision. The complexity of implementation is site-specific. All 10 are expected to be completed by June 30, 2006. That information should be sufficient for purposes of this proceeding.

APWU/USPS-T2-6(k)

This interrogatory refers to the redactions of 3-digit-to-3-digit First-Class Mail Origin-Destination Information System (ODIS) volume data from Worksheet 7 of each of the AMP decision packages in USPS Library References N2006-1/5 and 6 and inquires about the basis for those redactions. In its February 23, 2006, objection to the interrogatory, the Postal Service intended to refer the APWU to the contemporaneously filed explanation of the objection to APWU/USPS-T1-9(f), which addresses the same issue. The Postal Service apologizes for the confusion case by an instance of apparent typographical brain-lock. However, APWU has not been prejudiced, since the preface page in USPS Library Reference N2006-1/5, to which APWU’s attention was invited

when it was explicitly referenced in the objection, explains the basis for the redactions on the various Worksheets 4 and 7 in that Library Reference.

It has been long-standing postal policy to regard mail-class specific facility volume data and point-to-point (facility to facility) volume data for all mail classes as commercially sensitive and privileged. The Postal Service considers that its competitive interests would suffer harm because the public disclosure of such data would permit postal competitors to more keenly determine where to target their marketing strategies to siphon away mail volume to alternative media or delivery services.

The information responsive to this interrogatory was provided in the Library Reference when it was filed on February 14, 2006 and referenced in the objection filed nine days later. The Postal Service requests that the Commission declare this aspect of the APWU motion to be moot.

APWU/USPS-T2-8

This interrogatory seeks a copy of the USPS AMP Communications Kit. Indeed, public communications are an important part of the AMP implementation process. Accordingly, the Postal Service has been forthcoming in describing its plans for doing so. USPS-T-2 at 12-16; USPS Library Reference N2006-1/4. However, there are limits to the level of detail about the internal administration of the Postal Service that are relevant to this docket. The APWU is mistaken in believing that the § 3661 advisory role of the Commission extends to such matters as instructions for the formatting and wording of communications regarding the initiation of AMP studies and the public announcement of final decisions -- whether such communications are in the form of correspondence from postal management to Congressional representatives or

members of the public, internal USPS online communications from postal management to its employees, or notes for stand-up talks by supervisors on the workroom floor to supplement the more formal communications between management and labor.

As explained in the Postal Service's February 23, 2006 objection to this interrogatory, the Communications Kit consists of templates and instructions for the composition of external correspondence to mailers, elected officials and broadcast and print news organizations regarding the initiation of local AMP studies and the announcement of AMP decisions. It also contains templates for disseminating the same or similar information to postal employees through the various means of communication that are utilized internally by postal management. The purpose of the Kit, as one might surmise, is to implement the AMP Communications Plan by guiding the various postal personnel at Headquarters and in the field who are responsible for preparing AMP-related communications, to ensure that they do so in a manner that conforms to agency policies designed to ensure consistency and accuracy.

This interrogatory, by a party with its own peculiar interest in the inner workings of postal management, seeks to inject labor-management issues into a proceeding where they do not belong. The contents of the Kit may relate to the AMP review process. That alone, however, does not make the contents of the Kit relevant to the issues the Commission must decide under § 3661. Otherwise, the strongest assertion that the APWU can make in support of its motion is that the Kit is "available." APWU Motion at 18. Were that the controlling standard, virtually every document in the possession of the Postal Service would be subject to disclosure in this proceeding. Accordingly, the Commission should deny this portion of the APWU motion to compel.

In conclusion, for the reasons explained above, the Commission should deny the motion of the APWU in its entirety.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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