

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

EVOLUTIONARY NETWORK DEVELOPMENT  
SERVICE CHANGES, 2006

Docket No. N2006-1

UNITED STATES POSTAL SERVICE NOTICE OF FILING OF REVISED RESPONSE  
OF WITNESS WILLIAMS TO APWU INTERROGATORY APWU/USPS-T2-1(a)  
(March 17, 2006) [ERRATA]

The United States Postal Service hereby submits a partial response of witness Williams to the following interrogatory of the American Postal Workers Union, AFL-CIO, filed on February 17, 2006: APWU/USPS-T2-1(a). A partial objection to subpart (a) of this interrogatory was filed on February 23, 2006, with an indication that a partial response to subpart (a) would be filed. The entire interrogatory is stated verbatim and is followed by the partial response to subpart (a) and the responses originally filed in response to subparts (b) through (h). The revised response to APWU/USPS-T2-1 filed today supersedes the original response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS WILLIAMS TO  
INTERROGATORIES OF THE AMERICAN POSTAL WORKERS UNION  
Revised: March 17, 2006**

**APWU/USPS-T2-1**

On page 8 of your testimony, you state “there were about two dozen local AMP studies in progress” while the END model was being developed and that AMP review activity was generally suspended.

- a) Please provide a complete list of these approximately “two dozen” AMP studies that were underway. Please provide the date of initiation and the person requesting each AMP. Were any of these projects initiated because of the Postal Service’s ongoing network redesign efforts? Were any of these projects initiated based on the END models?
- b) Were there any AMP studies not put on hold during END model development? If so, which ones went ahead?
- c) Were the ten projects that were used to test the “internal administrative processes that might be useful in a ‘full-up’ implementation of END” selected from this group of approximately “two dozen” AMP studies that had been undertaken?
- d) Please provide the criteria for the selection of the 10 AMP studies presented in your submission to the Commission in N 2006-1, and identify the person or persons who made the selection.
- e) For any of the AMP studies on the list in (a), but not among the ten listed in Library Reference N2006-1/5, did the Postal Service choose not to move forward to completion because of results from END simulations? If so, explain; if not, state the reasons for not permitting the other studies to move forward.
- f) List all AMP studies begun since December 31, 2001.
- g) For all AMP studies completed since December 31, 2001, that are not among the 10 studies included in your submission to the Commission in N 2006-1,
  - present a report in which the locations and other identifying information are redacted to protect the Postal Service’s “competitive interests.”
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**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS WILLIAMS TO  
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**APWU/USPS-T2-1 (continued)**

- With all identifying information redacted, the report will identify locations only by assigned letters (A, B, C, etc.).
  - Within each AMP study, ZIP codes must be replaced using a single number for each ZIP code (thus, an AMP report with 24 ZIP codes would have ZIP codes numbered 1, 2, 3 etc. through 24).
- h) For every report produced in response to interrogatory g above, include all the data redacted from the 10 AMP reports included in your submission to the Commission in N 2006-1, including without limitation
- each facility's total mail volume,
  - each facility's total mail volume disaggregated on mail-class specific and service-specific bases
  - on Worksheet 4 facility-specific data reflecting estimated operation-specific originating and/or destinating mail volumes and processing costs, made specific for one class or service where appropriate
  - on Worksheet 7 mail class-specific origin-destination volume data reflecting the volume per mail class that originates or destinate at a single facility, or travels from one specific 3-digit ZIP Code area to another specific 3-digit ZIP Code area.

**RESPONSE**

- (a) [Partial objection filed.] Each study was independently proposed by the field in accordance with the traditional application of the AMP review process. When the possibility became apparent that that objectives of the Evolutionary Network Development strategy then under development and the objectives of any isolated "pre-END" study proposals might not necessarily be in synch, it was determined that each of these isolated study proposals should be put on hold until such time as a decision was made about overall network strategy. That decision has been made. As appropriate, these "pre-END" AMP candidates are expected to be subjected to the AMP process

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**Response to APWU/USPS-T2-1 (continued)**

- in conjunction with the objectives of END.
- (b) There were six AMPs approved in 2004: Oil City, PA; Bradford, PA; Du Bois, PA; Steubenville, OH; Bronx, NY; West Jersey, NJ; and Marina, CA.
  - (c) Seven of the 10 AMP studies approved in October 2005 were included in the group of suspended AMP studies.
  - (d) After consultation with local management, area management proposed to headquarters AMP studies which met current and future network requirements to proceed with.
  - (e) No.
  - (f-h) Objection filed.