

Before the  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

Evolutionary Network Development )  
Service Changes, 2006 )

Docket No. N2006-1

OFFICE OF THE CONSUMER ADVOCATE  
INTERROGATORIES TO UNITED STATES POSTAL SERVICE  
(OCA/USPS-17-22)  
March 21, 2006

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Pursuant to Rules 25 through 28 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA interrogatories OCA/USPS-1-5, dated March 3, 2006, are hereby incorporated by reference.

Respectfully submitted,

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OCA/USPS-17. The following interrogatories refer to USPS-LR-N2006-1/4 the “USPS Area Mail Processing Communications Plan,” page 2, titled “AMP Communications Check List” and to USPS-LR-N2006-1/5.

- a. Please explain what steps the Postal Service took to insure that each of the nine areas listed below were aware of the Postal Service's proposed actions in each of the 10 network redesign facilities in LR-N2006-1/5: (1) local employee unions; (2) local craft and EAS employees; (3) area management associations; (4) interested members of Congress; (5) local TV and radio news media; (6) local newspaper(s); (7) local community organizations/groups including civic and neighborhood associations, and local political leaders; (8) major mailers; and (9) national unions and management associations.
- b. For each of the ten network redesign locations, please provide the time lines used to address the following: (1) the first notification of the proposal; (2) the length of time given to respond to the Service's notification; (3) the time taken by the Postal Service to respond to questions or other issues; and, (4) the time between final responses from the Postal Service to actual commencement of implementation of each of the network changes. If there was no time line developed for each, please explain why the Postal Service decided one was not needed.
- c. Please explain how frequently and under what conditions the local media reported to the general public of the Postal Service's intent to redesign the transportation network for each of the ten locations. If the Postal Service did not monitor the media reports, please explain how the Service made sure local

residents and businesses were informed of the network realignment in their local area and the possible impact it would have upon the mail.

- d. In each of the ten areas impacted by the proposed network redesigns, did the Postal Service pay for local: (1) television news bulletins or advertisements, (2) local radio announcements or advertisements; and/or, (3) local newspaper announcements or advertisements informing communities impacted by the proposed network realignments of the forthcoming changes?
- (i) If your response is affirmative, please provide examples of scripts and visual aids used in the television ads, radio announcements, or news bulletins.
  - (ii) If your answer is other than affirmative, please explain why no such announcements were provided to the general public.
- e. For each of the ten network redesign locations, did the Postal Service conduct any “Town Hall” meetings with the general public to either give them notice of or receive feedback from them, on the proposed local network redesign? If not, please explain why local “Town Hall” meetings were not conducted in every instance.

OCA/USPS-18. Please refer to USPS-LR-N2006-1/4. Page 2 of the library reference provides an “AMP Communications Check List.”

- a. For the ten locations that are undergoing a redesign review and implementation process listed in USPS-LR-N2006-1/5, please explain how the Postal Service

and/or local management determined what community organizations and groups were to be provided notices of intent of the forthcoming network redesign.

- b. If those organizations and groups notified of a forthcoming network redesign have questions, concerns, or other issues regarding the impending network redesign, please explain: (1) what process is in place for contacting the Service; (2) what office do outside parties contact within the Postal Service regarding questions, concerns or other issues; and (3) what position within the Postal Service has the authority to resolve issues that may arise.
- c. After a network redesign has been completed, how frequently will the Postal Service perform follow-up reviews of both the operational results and the ensuing cost savings to identify the following:
  - (i) The actual cost savings and/or cost increases realized by the Postal Service.
  - (ii) The actual increases and/or decreases in the number of Postal Service employees.
  - (iii) The actual impact on service standards for each class and subclass of mail affected.
  - (iv) The actual financial impact on the community as a result of the network redesign.
  - (v) The actual excess capacity at the consolidated facility after the workload transfers.
  - (vi) For those facilities left with excess capacity as a result of the consolidation, please identify what actions the Service is taking to

reduce or eliminate that excess. If the Service does not plan on taking any action to reduce or eliminate the excess capacity, please explain.

- (vii) If the Postal Service does not intend to perform follow-up analyses, please explain how the Service will understand the actual financial and operational impact of the evolutionary network redesign (END)?
- (viii) Upon completion of both the facility consolidation and the financial and operational follow-up analyses for each of the ten locations, please identify: (1) when that information will be made available to the Postal Rate Commission (PRC) and (2) in what specific format it will be provided. If the Service does not intend to make the analyses available to the PRC, please explain why not.

OCA/USPS-19. The following refers to USPS-LR-N2006-1/5. Please refer to the AMP worksheet 5, labeled "Impact on Craft Personnel – Number of Positions."

- a. Please identify what the acronym "ET" stands for and provide a description of the work that craft performs.
- b. Please identify what the acronym "MPE" stands for and provide a description of the work that craft performs.

OCA/USPS-20. The following interrogatories refer to the March 3, 2006, issue of the POSTCOM Bulletin.

- a. On page 2, POSTCOM states that Paul Vogel, Postal Service Vice President of network operations, made “a series of presentations before industry groups, trade reporters and mainstream media . . . [that] laid out the vision and strategy for realigning the network as well as the reasons it must be done.” Please provide, as a USPS library reference, copies of each of Paul Vogel’s presentations.
- b. On page 4, POSTCOM provides a table of ten Area Mail Processing (AMP) facilities that were approved in FY 2006. The footnote indicates that six of the AMP proposals were implemented as of February 16, 2006. (Bridgeport P&DF to Stamford P&DC; Waterbury P&DF to South Connecticut P&DC; NW Boston P&DC to Boston P&DC; Marysville P&DF to Sacramento P&DC; Greensburg PO to Pittsburgh P&DC; and Kinston P&DF to Fayetteville P&DC.)
  - (i) Please confirm that the six AMP network transfers listed in part (b) of this interrogatory have been implemented. If you are unable to confirm, please explain.
  - (ii) Please indicate which of the above six AMP network transfers implemented, if any, have been completed.
  - (iii) For each of the AMP proposals that have been implemented, please identify: (1) what specific steps were taken to implement each transfer and (2) identify all problems that were encountered and how those problems were resolved.

- (iv) For each of the ten network transfers that have been or will be implemented, please identify the impact on: (1) collection box pick-ups, (2) latest mail dispatch times at the local retail facilities, (3) alterations in household mail delivery times, and (4) the actual change in service standards.
- (v) Currently, what plans does the Postal Service have to gather input from those consumers impacted by the network realignment regarding problems they may have experienced as a result of the changes? Include in your response, the actions the Postal Service plans in order to resolve: (1) consumer issues (2) community issues (3) mailer issues, and (4) ensure that to the extent possible they are not repeated during future network realignments.

OCA/USPS-21. Please refer to the sample timeline for completion of an AMP attached to the USPS Office of the Inspector General Audit Report in LR-N2006-1/8, Appendix A. In that timeline, no specific time period is indicated for input from interested groups within and without the USPS, government officials, or the public in general. Also, the USPS AMP Communication Plan in LR-N2006-1/4, page 5, provides only for USPS notice to various groups of a feasibility study but does not provide that the notice establish procedures to obtain input from those groups.

- a. Please indicate the specific points or time periods within the timeline when the USPS solicits input from each of the following groups: interested groups within

the USPS, interested groups outside the USPS, government officials at federal, state, and local levels, and the public in general.

- b. If the time periods for soliciting and obtaining input from each of these four groups are not during the time period to “Complete AMP Study (0-6 Months),” please explain why not.
- c. Please indicate where on this timeline the USPS believes it has filed its request for an advisory report from the Postal Rate Commission pursuant to §3661 of the Postal Reorganization Act with respect to each of the studies in the group of 10 AMP reports included in LR-N2006-1/5 and the AMP study in LR-N2006-1/6.
- d. The Postal Service has submitted a proposal to this Commission pursuant to §3661 of the Postal Reorganization Act which will generally affect service on a nationwide or substantially nationwide basis.
  - i. Please state the effective date of such proposal.
  - ii. Is it the position of the Postal Service that the proposal in this case was filed “within a reasonable time prior to the effective date of such proposal?”  
Please explain your answer.

OCA/USPS–22. The individual network redesigns listed in USPS-LR-N2006-1/6 indicate that the redesign program will result in cost savings to those specific locations. Some employees appear to be relocating to other sites. Additionally, there is no overall information on the impact of the changes on the Postal Service in total. Therefore, in terms of total USPS operational costs for FY2006, please indicate the total financial impact (savings versus cost increases) to the USPS as a result of the ten network redesigns. Please include in your response:

- a. Savings/cost increases resulting from a reduction, or an increase, in total work hours (include in your response both hours and dollars);
- b. Savings/cost increases resulting from equipment placed in or taken out of service;
- c. Savings/cost increases resulting from reduced or increased transportation costs;
- d. Savings/cost increases resulting from reduced or increased maintenance requirements;
- e. Savings/cost increases in total utility expenses;
- f. Savings/cost increases resulting from USPS paid relocation expenses; and
- g. Specifically identify any additional savings/cost increases not previously listed.