

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
WITNESS DAVID E. WILLIAMS (OCA/USPS-T2-7-16)
March 21, 2006

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-T2-7. Please turn to your testimony, at page 3, lines 13 through 18. You indicate that a local AMP study could be initiated on the basis that “service and/or efficiency could be improved....” In the case of AMP studies completed during and after 2002, please indicate on a case-by-case basis the number of instances associated with AMP studies where there was a determination that:

- a. Only service (but not efficiency) could be improved;
- b. Efficiency (but not service) could be improved;
- c. Service and efficiency could both be improved.

OCA/USPS-T2-8. Please turn to your testimony at page 5, lines 19 through 21. You indicate that “consultations between the P&DC or District sponsoring the AMP study and the Area Office may lead to modification to the original proposal.” In the case of each AMP study completed during and after 2002, and where only service (but not efficiency) could be improved,

- a. How often have there been modifications to the original proposal?
- b. What were the reasons, factors, or circumstances causing modifications?
- c. Please provide on a case-by-case basis the number and types of modifications made to the original proposal.

OCA/USPS-T2-9. Please turn to your testimony at page 6, lines 2 through 5. You state: “A critical element of Headquarters review is an evaluation of potential service standard upgrades and/or downgrades if the operational changes implied by an AMP proposal were implemented.” For those AMP studies completed during and after 2002, please provide the following:

- a. On a case-by-case basis, please indicate by mail class the number of service upgrades and the number of service downgrades to 3-digit ZIP Code pairs.
- b. On a case-by-case basis, please provide the number of modifications to anticipated service upgrades and downgrades to 3-digit ZIP Code pairs resulting from "consultations between the Area Office and Headquarters" as mentioned on page 6 at line 6.

OCA/USPS-T2-10. In the case of AMP studies completed during and since 2002, please provide, on a case-by-case basis, the number of months required for the implementation of the proposed changes resulting from the AMP studies.

OCA/USPS-T2-11. Your testimony at page 11, lines 1 through 2, states that, "[T]he Postal Service will not know particular outcomes until each AMP Post Implementation Review (PIR) is completed." For those AMP PIRS that only service (but not efficiency) could be improved:

- a. Do you yet have any follow-on data for any of the PIRs?
- b. Other than the AMP studies mentioned in this filing, how many AMP studies have been conducted during the past 10 years?
- c. For the studies identified in (b), how many implementation reviews have taken place? In your response, please include sample copies of those PIRs and explain how the information gathered has impacted proposed consolidations.

OCA/USPS-T2-12. Your testimony at page 10, lines 3 through 14, provides the impacts from the ten AMP packages on a cumulative basis. You then indicate in lines 14 to 17

that “The Postal Service does not regard these 10 AMP proposals or their results to be typical or representative of AMP proposals or results that are expected to be reviewed and implemented when the process is rolled out nationwide.” Please describe what you expect the typical or representative results of AMP proposals will be when the process is rolled out nationwide.

OCA/USPS-T2-13. For the 10 AMP studies described in Library Reference N2006-1/5, the savings listed appear to reflect savings for the first year.

- a. Are other types of savings, such as the reduction of excess capacity or increased use of advanced automation, expected in later years, and if so, what are these types of savings?
- b. What would the timeline for the various types of savings be?
- c. How long would it take for all planned savings to be realized?
- d. How would the existing AMP follow-up procedures be modified to reflect the savings achieved in later years?

OCA/USPS-T2-14. Your testimony at page 11, lines 14 through 15, identifies one of several general Postal Service principles underlying network changes as “Consideration of locally-developed alternative network realignment proposals and changes in the application of service standards....”

- a. How many locally developed alternative realignment proposals are considered besides END and AMP proposals?

- b. What causes the locally developed alternatives to be developed in lieu of, or independently of, END and AMP proposals?
- c. What is the current implementation status of the locally developed alternatives for each of the 10 AMP proposals? Please provide this information on a case-by-case basis.

OCA/USPS-T2-15. At page 11 of your testimony, you indicate that preliminary determinations by local and district management revealed there was considerable opportunity for originating AMP studies system wide.

- a. Were the determinations made independent of the END modeling process?
- b. Assuming that your answer is “yes,” please explain the relationship of the decision to examine AMP studies with the decision-making process to implement use of the END model

OCA/USPS-T2-16. Your testimony at page 2, lines 3 through 6, indicates that the Postal Service has modified its mail processing and distribution network based on factors such as technological advancements.

- a. Are the effects of deploying advanced automation, such as the FSS machines, included in developing planned savings for AMP studies?
- b. Are such effects included in the END modeling process?