

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

**Evolutionary Network Development
Service Changes, 2006**

Docket No. N2006-1

**INTERROGATORIES OF AMERICAN POSTAL WORKERS UNION, AFL-CIO TO
USPS WITNESS WILLIAMS (APWU/USPS T2-34-48)
(March 23, 2006)**

Pursuant to Rules 25, 26, and 27 of the Rules of Practice, The American Postal Workers Union, AFL-CIO directs the following interrogatories to USPS witness David E. Williams. If the witness is unable to respond to any interrogatory, APWU requests that a response be provided by an appropriate person capable of providing an answer.

Respectfully submitted,

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APWU/USPS-T2-34 Please examine the density analysis reports for the most recent year for each of the 10 consolidated offices that are presented in N2006-1/5. Based on those reports, approximately what percentage of the originating mail that was or would be sent to the AMPC facility would return as destinating mail to each of the consolidated offices?

APWU/USPS-T2-35 At the initiation of the AMP for Yakima, the study was characterized as an effort to determine whether sending all Yakima's non-cancelled mail to Pasco for cancellation was a more economical way of processing Yakima non-cancelled mail.

- a) Please identify all mail that would be considered non-cancelled mail. Is this only collection mail?
- b) Does Yakima have a Bulk Mail Acceptance Unit? What changes to the handling of that mail would be expected if this AMP is finalized?

APWU/USPS-T2-36 Please identify all cases in which the number of excessed employees in the ten consolidated offices presented in N2006-1/5 was different from what was proposed in the AMP.

APWU/USPS-T2-37 For each of the ten consolidated offices presented in N2006-1/5,

- a) please identify the number of collection boxes that were or will be required to have earlier pickup times because of the consolidation and the number of minutes by which the pick up time has changed.
- b) Was any analysis conducted during the AMP study or at any time that identified approximately how many pieces of mail would normally be deposited after the new pick-up time and no later than the old pick-up time? If so, please describe the analysis and its results.

APWU/USPS-T2-38 For each of the ten consolidated offices presented in N2006-1/5 where the transfer of mail has been completed, please identify all cases in which the carriers' schedules have had to be changed to accommodate the arrival time of destinating mail from the AMPC facility.

APWU/USPS-T2-39 Under what circumstances would the TPH for an operation be less than the FHP for a specific operation number?

APWU/USPS-T2-40 Do bulk mailers dropping mail at plants losing originating mail processing receive the same level of discounts as they did when those plants had outgoing primary operations or do they have to take the mail to the AMPC facility to qualify for the same level of discounts?

For the consolidated units in N2006-1/5 where the mail transfer has taken place:

- a) What percentage of the bulk mailers dropping mail at each of the consolidated units changed their drop to the AMPC facility locations?
- b) What percentage of bulk mailers with drops at the consolidated locations had to change the time of their mail drops to accommodate the changes in the mail processing procedures.
- c) What percentage of bulk mailers have to complete their mail preparation operations earlier to make drops at new locations or new cutoff times?

APWU/USPS-T2-41 The following AMP studies were not included in the 41 studies that Mr. Williams indicated were currently underway although notification has been given that these areas are undergoing an AMP study: Daytona Beach FL P&DC to Jacksonville FL P&DC, Sheridan WY CSMPC to Casper WY P&DC, and Rockford IL P&DC to Palatine IL P&DC.

- a) Please identify which, if any, of these three AMPs were evaluated using the END modeling systems.
- b) Please identify which, if any, of these three AMPs have been cancelled.
- c) Please provide a status on each of these AMPs that have not been cancelled and explain why they were not included on Mr. Williams' list.

APWU/USPS-T2-42 Following up on your response to APWU/USPS-T2-1 (c):

- a) Please identify which three AMP studies approved in October 2005 were not part of the suspended group.
- b) Where did those three AMP studies originate from if they were not part of the suspended group?

APWU/USPS-T2-43 Following up on your response to APWU/USPS-T2-9, the statement is made that "there are operational changes that do not involve either the END model or the AMP procedures." What types of operational changes fall into this category?

APWU/USPS-T2-44 Following up on your response to APWU/USPS-T2-11,

- a) What information did the END model runs provide that validated the new facility's role in the future network.

- b) What parameters are provided to the model about the shape and scope of the future network?
- c) Does the reference to facilities in this response indicate that there is more than one facility being considered for this area?

APWU/USPS-T2-45 Following up on your response to APWU/USPS-T2-12, please describe more precisely the scope and nature of the “inputs that can be taken into account during the AMP process” that the END model produces.

APWU/USPS-T2-46 Following up on your response to APWU/USPS-T2-1 (b) were any of the six AMPs approved in 2004 run through the END models (or their precursors) either at the time of the AMP or after it was approved to test the system?

APWU/USPS-T2-47 Following up on your response to APWU/USPS-T2-6 (b), on page 000020 of N2006-1/5 the following statement is made “outgoing operations that will remain are Express, PARS intercept, Platform, and Registry.” Are these operations all considered to be distinct from Pasadena originating mail? In particular how are Express and registry mail handled after this consolidation?

APWU/USPS-T2-48 On page 000184 of N2006-1/5, the following statement is made, “Mojave has already attrited the positions identified in the savings.” If these positions were not current positions when the AMP was filed how can they be considered savings when the AMP is approved?