

**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 T2-49-51)
(March 28, 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-T2-49 Please consult the detailed underlying data in Worksheets 4 and 4a for the Waterbury consolidation (data has been redacted in the version submitted to the PRC) and confirm each of the following (the discussion has been confined to productivity numbers so as to not disclose the detailed volume numbers of concern to the USPS):

- a) Almost half of the calculated savings for this consolidation are generated from the 10C operation (Consolidated Mail Preparation Stamped) where the Southern CT receiving facility's productivity appears to be slightly over 4,000 FHP/hr. compared with the Waterbury facilities productivity of slightly less than 2,300 FHP/hr. If not confirmed, what is the appropriate percentage for this operation?
- b) About 20 percent of the calculated savings for this consolidation are generated from converting the Waterbury 271 operation (DBCS-OSS outgoing primary) with a productivity of 6,673 FHP/hr. to the Southern CT 891 (DBCS-outgoing primary) operation with a productivity of 20,128 FHP/hr. If not confirmed, what is the appropriate percentage for this operation?
- c) The assumed productivity for Southern CT 891 operation is based on actual productivity for outgoing primary operations.
- d) That the savings for the 891 operation would have been reduced by almost 25 percent had the conversion been done using the TPH/hr. productivity rather than the FHP/hr. productivity to calculate the proposed workhours for Southern CT.
- e) That the proposed workhours for operation 134 at Southern CT assumes that Southern CT's own productivity on its small parcel and bundle sorter of 279 TPH/ hr. is combined with the productivity for Waterbury's 110 operations with a productivity of 1348 TPH/hr. Also, please explain how the higher productivity will be achieved on Southern CT's SPBS equipment.
- f) That the mail handled by the Waterbury's 281 operation (DBCS ISS-outgoing primary) will be handled in a less efficient way once the mail is switched to Southern CT's 881 operation (OCR ISS-outgoing primary).
- g) That 6 percent of the calculated savings comes from Waterbury's 841 operation which disappears (i.e. no mail is transferred to Southern CT). If not confirmed, what is the appropriate percentage for this operation?

APWU/USPS-T2-50 Please confirm that the impact on craft personnel generated in worksheet 5 is not tied directly to the workhour numbers in worksheets 4 and 4a.

APWU/USPS-T2-51 Please confirm that the annual workhour savings/cost shown on the executive summary is generated from worksheets 4 and 4a and not from worksheet 5.