

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

**REQUEST OF THE UNITED STATES POSTAL SERVICE
FOR AN ADVISORY OPINION ON CHANGES IN
POSTAL SERVICES**

Docket No. N2006-1

**FIRST SET OF INTERROGATORIES OF
THE ASSOCIATION FOR POSTAL COMMERCE
TO USPS WITNESS DAVID E. WILLIAMS**

(POSTCOM/USPS-T2-1 - 3)

Pursuant to Sections 25 through 27 of the rules of practice, the Association for Postal Commerce directs the attached First Set of Interrogatories to Witness David E. Williams. If the witness is unable to respond to any interrogatory or request for production of documents, PostCom requests that a response be otherwise provided by the Postal Service.

Respectfully submitted,

Ian D. Volner
Rita L. Brickman
Venable LLP
575 7th Street, NW
Washington, DC 20004-1601
(202) 344-4814
idvolner@venable.com
Counsel to Association for Postal Commerce

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DC2:735992

POSTCOM/USPS-T2-1. On p. 6 of your testimony, you indicate that the implementation of an Area Mail Processing (AMP) change may take up to six months to complete.

(a) Is there a process for developing, reviewing and approving an AMP implementation plan? (By implementation plan, we are referring to a plan that may address moving equipment, relocating staff, or rescheduling deliveries and shipments.)

(b) If the answer to (a) is affirmative, please describe a typical implementation plan, and identify the information included in such a plan.

(c) Please provide copies of each of the implementation plans prepared for the ten AMP implementations that were identified in Library Reference USPS-LR-N2006-1/5.

(d) How do the AMP implementation plans (if any) take into account peak mailing periods to avoid service interruptions and delays during these times?

(e) Does each AMP implementation plan (if any) ensure that service is being or will be provided consistent with the levels of service described in the related AMP proposal during the course of implementation? If so, please explain how. If not, please explain why not.

(f) Are mailers involved with the Postal Service in the process of implementation planning? If so, please describe how and when.

POSTCOM/USPS-T2-2.

(a) During the course of an AMP implementation, does the Postal Service monitor whether service standards are being met? If so, how?

(b) During the course of an AMP implementation, does the Postal Service monitor whether service is being provided consistent with the levels of service described in the approved AMP Proposal? If so, how?

(c) Please describe the management oversight given to any monitoring described in response to (a) or (b) during the course of an AMP implementation.

(d) What systems or processes are in place to prevent service interruptions or delays related to an AMP implementation?

(e) What reporting, information systems, or data does the Postal Service use to monitor AMP implementations?

(f) What reporting, information systems, or data does the Postal Service use to monitor delivery performance? (If these systems or data apply to particular classes of mail, please identify the applicable mail class.)

(g) Has the Postal Service used CONFIRM data to monitor implementation of consolidations? If so, please describe when and how. If not, please explain why not.

POSTCOM/USPS-T2-3.

(a) Has the Postal Service used CONFIRM data to support any claims and conclusions in AMP analyses or studies?

(b) If so, please describe how CONFIRM data is used.

(c) If not, please explain why not.