

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

EVOLUTIONARY NETWORK DEVELOPMENT  
SERVICE CHANGES, 2006

Docket No. N2006-1

RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS WILLIAMS  
TO APWU INTERROGATORIES APWU/USPS-T2-34 THROUGH 46  
(April 11, 2006)

The United States Postal Service hereby submits the response of witness Williams to the following interrogatories of the American Postal Workers Union, AFL-CIO, filed on March 23, 2006: APWU/USPS-T2-34 through 46.

The interrogatories are stated verbatim and followed by the responses.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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**RESPONSE OF UNITED STATES POSTAL SERVICE WILLIAMS TO  
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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?

**RESPONSE**

Density analysis reports are not provided as a part of the AMP study documentation.

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**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?

**RESPONSE**

- (a) Yes.
- (b) The Yakima WA AMP study is still underway.

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**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.

**RESPONSE**

Any differences between expected and actual results will be identified and evaluated as part of the post-implementation review process.

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**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.

**RESPONSE**

- a. See the response to OCA/USPS-20(b)(iv).
- b. I am not aware of any collection box mail piece studies.

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**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.

**RESPONSE**

I am not aware of any modifications to carrier schedules as a result of an AMP implementation.

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

**RESPONSE**

I believe that in the majority of the circumstances where that might occur would be when mail is weighed into one operation as FHP (not withdrawn) but taken to a similar operation and processed.

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**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?

**RESPONSE**

(a-c) We do not conduct that analysis as part of the AMP study.

## **RESPONSE OF UNITED STATES POSTAL SERVICE WILLIAMS TO INTERROGATORY OF THE AMERICAN POSTAL WORKERS UNION**

**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.

### **RESPONSE**

- (a) All three of the AMPs were evaluated with the END model.
- (b) None of the three AMPs have been cancelled.
- (c) The Daytona Beach, FL AMP study was delayed while considering a shift to focus on the Mid-Florida, FL P&DC as the AMPC. The Sheridan, WY CSMPC AMP study is in progress, having changed the AMPC from Billings, MT to Casper, WY. The Rockford, IL AMP was on hold and has recently resumed.

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**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?

**RESPONSE**

- (a) Monmouth NJ AMP, NW Boston MA AMP, Olympia WA AMP.
- (b) The three AMPs were proposed by their respective District Manager and/or Senior Plant Manager.

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**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?

**RESPONSE**

Operational changes which do not require an AMP include those referenced on page 4 of USPS-LR-N2006-1/3.

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**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?

**RESPONSE**

- (a) The simulation model validates that the proposed consolidation is feasible given available capacity and service.
- (b) It is not clear what is sought by this question. The scope of END is to evaluate all function 1 mail processing facilities.
- (c) The word "facility's" should have been used in the response.

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**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.

**RESPONSE**

My understanding is that the simulation model tests the feasibility of a proposed role for a given mail processing facility in the future network. Headquarters and Field managers can then consider this in choosing an operational consolidation proposal to subject to AMP analysis. I did not intend in my response to suggest that the simulation model produced inputs used as a part of an AMP consolidation review, only that simulation model results assisted in the selection of an AMP study target.

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**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?

**RESPONSE**

I am informed that the Bronx, NY; West Jersey, NJ; and Steubenville, OH plants were included in END modeling. I also am informed that Oil City, PA; Bradford, PA; and Du Bois, PA Post Offices were not individually modeled; however, all function 1 workload was included.