Postal Rate Commission
Submitted 4/25/2006 4:12 pm
Filing ID: 48440
Accepted 4/25/2006

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 SHAH TO APWU INTERROGATORIES REDIRECTED FROM WITNESS WILLIAMS (APWU/USPS-T2-20, 21, 29 AND 30)
(April 25, 2006)

The United States Postal Service hereby submits the responses of witness Shah to the following interrogatories of the American Postal Workers Union, AFL-CIO, filed on March 23, 2006: APWU/USPS-T2-20, 21, 29 and 30. The interrogatories were redirected from witness Williams to witness Shah for response.

Each interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS SHAH
TO INTERROGATORY OF AMERICAN POSTAL WORKERS UNION, AFL-CIO
REDIRECTED FROM WITNESS WILLIAMS

APWU/USPS-T2-20 For the 10 AMP projects used for END testing and presented in Library Reference N2006-1/5, did the END optimization models play a role? Please describe the optimization model role separate from the simulation model role for each of these 10 studies.

RESPONSE:

The END optimization model identified the 10 AMPs as potential candidates for consolidation. The END simulation model was used to test the feasibility of this recommendation.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS SHAH
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APWU/USPS-T2-21 Please refer to Interrogatory APWU/USPS-T2-2(b)-(c) and your accompanying response. In your response, you indicated that there is no output from the END model presented in Library Reference N2006-1/5. As previously requested in APWU/USPS-T2-2(c), please provide model output and detailed descriptions and methodologies for each of the 10 AMP projects.

RESPONSE:

The END simulation models test the feasibility of the national network design, which includes the first 10 AMPs. We will review the outputs of the simulation model for a sample of these AMPs during the technical conference on 4/28/2006.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS SHAH
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APWU/USPS-T2-29 Please provide a general explanation for the role facility productivity plays in making decisions about mail transfers in the END process and analysis.

RESPONSE:

Facility productivity plays a role in the development of the optimization models cost functions, as described in the response to VP/USPS-T1-5. In addition, facility productivities are used in the development of the optimizations capacity function per operation.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS SHAH
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APWU/USPS-T2-30 Please describe the analysis that takes place in the AMP/END process to determine potential capacity constraints that may be faced by the receiving office within the time period necessary to meet their critical dispatch times.
a) How are the peak volumes during the time periods needed to make the dispatches determined for each facility and type of machine?
b) Which volume is used in running the simulations for these transfers? Is it average volume, a percentage of peak volume (if so what percentage), or peak volume?
c) Is a calculation made as to how frequently the mail volume transferred will exceed the available capacity in the receiving office? If so, how is that reflected in the cost calculations?
d) How is spare capacity determined for the machines and/or personnel at the receiving facility?
e) Please provide an example of any worksheets or reports that are used in this analysis.

RESPONSE:

(a) END models use volumes as a percentage of peak, calculated as averaged daily volume times 130% for all products. In addition, within the simulation model, arrival profiles are generated to depict the true availability of mail at each operation.

(b) See the response to subpart (a).

(c) Not within the END models.

(d) Excess capacity is a function of available capacity vs. required capacity, both of existing equipment and the potential of adding additional equipment, should the facility have available square footage.

(e) This analysis is internal to the simulation model and is not isolated in the form of specific reports.