

- c. Please describe in detail the economies that will be realized through this process.

2. How are vacant positions related to operations that are being consolidated under the AMP process handled? For example, if a consolidated facility has positions related to the consolidating operations that are vacant at the time of the consolidation, are the hours for those positions considered workhour savings in the AMP worksheets? Please identify, and provide applicable workhours for, relevant positions that were vacant at the time of consolidation for the 10 AMPs included in USPS-LR-N2006-1/5.

3. Please refer to witness Shah's response to APWU/USPS-T1-3(e). Witness Shah testifies that "[i]mplementation of AMP decisions can lead to network changes that can later be factored into the model." Please provide a specific example of an AMP decision that was factored into the END model and explain in detail how the AMP decision altered the END model output.

4. Please refer to the response of witness Williams to APWU/USPS-T2-11. In that response witness Williams states, "The END model validated the new facilities role in the future network."
 - a. Please describe specifically the future network contemplated in the above-referenced response, and the role of the new facility within that future network.
 - b. Please describe in detail how the END model validated the role of the new facility.
 - c. Please list specifically what data were used to validate the role of the new facility.

5. Please refer to USPS-LR-N2006-1/5.
 - a. Please provide unredacted versions of all worksheets for all 10 AMPs in USPS-LR-N2006-1/5. These worksheets may be provided under protective conditions.
 - b. On page 168, it is noted that for the Marysville consolidation the impact on Registered and Express Mail needs to be considered. Please explain what impact the consolidation will have on these two services.

6. Please refer to USPS-LR-N2006-1/7. On pages 29 through 32 it discusses various factors that impact productivity differences at mail processing plants including workload, physical size, layout of plants, and number of employees. Please discuss what impact consolidating mail processing operations from plants with smaller workloads into plants with greater workloads, from plants with fewer employees into plants with more employees, and from plants that are physically smaller into plants that are physically larger, would have on productivity of the Postal Service as a whole. Please discuss separately the impact of the above on labor productivity and total factor productivity.
 - a. How are the impacts identified above analyzed in the END models and the AMP process?
 - b. If the impacts identified in a. through c. above are not analyzed in either the END or the AMP process, at what point in the consolidation process does the Postal Service consider their impact on overall Postal Service productivity? Please explain fully.
 - c. On page 47 it states, “[t]he Service has begun using an Activity Based Costing program to determine differences in unit operating costs among plants and to identify opportunities for savings in plants.” Are these data used in the END models or the AMP studies?

7. On page 34 of USPS-LR-N2006-1/7, the GAO report identifies four types of excess capacity: (1) excess workhours; (2) excess physical infrastructure; (3) excess transportation capacity; and (4) excess capacity related to machines sitting idle.
 - a. Please describe in detail how the END models and AMP process weight each of these excess capacities.
 - b. Please describe in detail how the Postal Service’s plans for a future network address each of these excess capacities.

8. At USPS-T-1, page 8, witness Shah states, “[t]he Postal Service will analyze its current network to identify the areas of and reasons for excess capacity. The future network design will focus on minimizing the amount of excess capacity through better utilization of existing facilities” Have any of the facilities in USPS-LR-N2006-1/5 been identified as having excess capacity? If so, what types of excess capacity and what are the reasons for the excess capacity?

9. On page 60 of USPS-LR-N2006-1/7, the GAO report recommends that the Postal Service “establish a set of criteria for evaluating realignment decisions.” Please list and discuss in detail the Postal Service’s set of criteria used to evaluate realignment decisions related to its future network.

10. Will the conversion of Bulk Mail Centers (BMC) to Regional Distribution Centers (RDC) be implemented through the use of AMP studies? If not, explain in detail:
 - a. how the Postal Service will analyze the impact of the conversions;
 - b. how the Postal Service will notify stakeholders of changes;
 - c. how stakeholder input will be considered; and
 - d. how results will be monitored.

11. Will the conversion of HASPs to STCs be implemented through the use of AMP studies? If not, explain in detail:
 - a. how the Postal Service will analyze the impact of the conversions;
 - b. how the Postal Service will notify stakeholders of changes;
 - c. how stakeholder input will be considered; and
 - d. how results will be monitored.

12. This question refers to the Postal Service's response to OCA/USPS-8, which indicates that a downgrade from a certain overnight standard to a 2-day standard was anticipated as part of an AMP, but was later "negated by the procurement of additional transportation to maintain the overnight standard." Please explain fully:
 - a. how the procurement of additional transportation negated the anticipated downgrade;
 - b. whether the additional transportation referred to is surface transportation; and
 - c. whether negation was attributable *only* to the procurement of additional transportation, or whether any other factors, such as a change in dispatch time, also played a role.

13. The response to VP/USPS-T1-1, part b, states, "service standards are used as constraints within the model." Are the constraints referred to existing service standards or new service standards that the Postal Service deems acceptable?
 - a. If they are existing service standards, please explain how the new network configuration based on these models will affect service standards.
 - b. If they are new service standards, please identify them.

14. The response to VP/USPS-T1-5, part b, states, “the incremental cost of adding volume to a large operation is less than a small and medium operation.” Please provide any analysis that confirms this statement.

15. In response to Presiding Officer’s Information Request 1, question 4(b), a list of data inputs for the optimization model was provided. Please provide a similar list for the simulation model.

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Presiding Officer