

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

EVOLUTIONARY NETWORK DEVELOPMENT
SERVICE CHANGES, 2006

Docket No. N2006-1

COMPELLED RESPONSES OF
UNITED STATES POSTAL SERVICE WITNESS WILLIAMS
TO APWU INTERROGATORIES APWU/USPS-T2-1(a,f-h) and 3(b)
(May 8, 2006) [ERRATA]

In accordance with Presiding Officer's Ruling No. N2006-1/7 (May 5, 2006), the United States Postal Service hereby submits the responses of witness Williams to the interrogatories of the American Postal Workers Union: APWU/USPS-T2-1(a, f-h) and 3(b). Responses to other subparts of APWU/USPS-T2-1 and 3 were filed earlier. For administrative ease, all subparts of the interrogatories and the previously filed partial responses are incorporated herein, to provide one completely integrated response to all subparts of each interrogatory. Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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APWU/USPS-T2-1

On page 8 of your testimony, you state “there were about two dozen local AMP studies in progress” while the END model was being developed and that AMP review activity was generally suspended.

- a) Please provide a complete list of these approximately “two dozen” AMP studies that were underway. Please provide the date of initiation and the person requesting each AMP. Were any of these projects initiated because of the Postal Service’s ongoing network redesign efforts? Were any of these projects initiated based on the END models?
- b) Were there any AMP studies not put on hold during END model development? If so, which ones went ahead?
- c) Were the ten projects that were used to test the “internal administrative processes that might be useful in a ‘full-up’ implementation of END” selected from this group of approximately “two dozen” AMP studies that had been undertaken?
- d) Please provide the criteria for the selection of the 10 AMP studies presented in your submission to the Commission in N 2006-1, and identify the person or persons who made the selection.
- e) For any of the AMP studies on the list in (a), but not among the ten listed in Library Reference N2006-1/5, did the Postal Service choose not to move forward to completion because of results from END simulations? If so, explain; if not, state the reasons for not permitting the other studies to move forward.
- f) List all AMP studies begun since December 31, 2001.
- g) For all AMP studies completed since December 31, 2001, that are not among the 10 studies included in your submission to the Commission in N 2006-1,
 - present a report in which the locations and other identifying information are redacted to protect the Postal Service’s “competitive interests.”
 - With all identifying information redacted, the report will identify locations only by assigned letters (A, B, C, etc.).

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- Within each AMP study, ZIP codes must be replaced using a single number for each ZIP code (thus, an AMP report with 24 ZIP codes would have ZIP codes numbered 1, 2, 3 etc. through 24).

- h) For every report produced in response to interrogatory g above, include all the data redacted from the 10 AMP reports included in your submission to the Commission in N 2006-1, including without limitation
 - each facility's total mail volume,
 - each facility's total mail volume disaggregated on mail-class specific and service-specific bases
 - on Worksheet 4 facility-specific data reflecting estimated operation-specific originating and/or destinating mail volumes and processing costs, made specific for one class or service where appropriate
 - on Worksheet 7 mail class-specific origin-destination volume data reflecting the volume per mail class that originates or destinate at a single facility, or travels from one specific 3-digit ZIP Code area to another specific 3-digit ZIP Code area.

RESPONSE

(a) That list is as follows:

<u>Proposed AMP Site</u>	<u>AMPC</u>
1 Ashland, KY P&DF	Huntington, WV P&DC
2 Batesville, AR PO	Jonesboro, AR PO
3 Beaumont, TX P&DF	Houston, TX P&DC
4 Beckley, WV PO	Charlestown, WV P&DC
5 Bluefield, WV PO	Charlestown, WV P&DC
6 Bridgeport, CT P&DF	Stamford, CT P&DC
7 Bristol, VA PO	Roanoke, VA P&DC
8 Canton, OH P&DC	Akron, OH P&DC
9 Chillicothe, OH PO	Columbus, OH P&DC
10 Fort Smith, AR PO	Fayetteville, AR P&DF
11 Greensburg, PA PO	Pittsburgh, PA P&DC
12 Greenville, TX PO	North Texas, TX P&DC
13 Harrison, AR PO	Fayetteville, AR P&DF
14 Kinston, NC P&DC	Fayetteville, NC P&DC

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15	Lufkin, TX PO	East Texas, TX P&DC
16	Marysville, CA P&DF	Sacramento, CA P&DC
17	Mojave, CA PO	Santa Clarita, CA P&DC
18	Pasadena, CA P&DC	Los Angeles, CA P&DC
19	Russellville, AR PO	Little Rock, AR P&DC
20	Salinas, CA P&DF	San Jose, CA P&DC
21	Waterbury, CT P&DF	Southern Connecticut, CT P&DC
22	Wheeling, WV PO	Pittsburgh, PA P&DC Lehigh Valley, PA P&DC and Scranton, PA P&DF
23	Wilkes Barre, PA P&DF	
24	Zanesville, OH PO	Columbus, OH P&DC

- (b) There were six AMPs approved in 2004: Oil City, PA; Bradford, PA; Du Bois, PA; Steubenville, OH; Bronx, NY; West Jersey, NJ; and Marina, CA.
- (c) Seven of the 10 AMP studies approved in October 2005 were included in the group of suspended AMP studies.
- (d) After consultation with local management, area management proposed to headquarters AMP studies which met current and future network requirements to proceed with.
- (e) No.
- (f) 2002: 0
- 2003: 1 -- Pendleton, OR PO into Pasco, WA P&DF.
- 2004: 6 -- See the response to subpart (b).
- 2005: 11 -- See USPS LRs N2006-1/5 and N2006-1/6.
- 2006: 46 -- See the 41 listed in the Attachment to USPS T-2. The other

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RESPONSE to APWU/USPS-T2-1 (continued):

five are as follows: (1) Alamogordo, NM PO into El Paso, TX P&DC; (2) Las Cruces, NM PO into El Paso, TX P&DC; (3) Rockford, IL P&DC into Palatine, IL P&DC; (4) Flint, MI P&DC into NE Metro MI P&DC; (5) Detroit, MI P&DC into NE Metro MI P&DC.

- (g-h) Of the seven 2003-2004 AMP studies referenced in response to subpart (f), the Postal Service has only been able to locate records pertaining to the final six. Redacted copies of those documents will be filed as USPS Library Reference N2006-1/11. Unredacted copies will be filed as USPS Library Reference N2006-1/12, subject to protective conditions resulting from Presiding Officer's Ruling No. N2006-1/7.

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APWU/USPS-T2-3

On page 9 of your testimony you state "These ten AMP decisions currently are in the various stages of implementation and all are expected to be completed by June 2006."

- a) Please identify each of the stages of implementation for an AMP decision as referenced in the passage quoted above and state how long each stage is expected to take in a typical case.
- b) Please provide a timeline for each of the 10 projects or decisions included in your submission in N 2006-1, showing the amount of time taken for each stage or phase of the project or decision; state at which stage of implementation each project is at this time; and state when, between now and June 30 2006 each project is expected to be fully implemented.

RESPONSE

- (a) The main components of an AMP implementation include relocations of personnel, mail volume, and mail processing equipment, and implementation of any changes in the application of service standards to 3-digit ZIP Code pairs. Implementation of all elements can take up to six months to complete.
- (b) Eight of the ten AMPs have been fully implemented. In connection with the Olympia AMP, work continues on moving mail, personnel and equipment in accordance with the implementation plan. There has been a delay in Kinston associated with the transfer of administrative oversight of the affected services areas from the Eastern Area to the Capital Metro Area . Both are expected to be fully implemented by the end of June 2006.