

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

**Evolutionary Network Development
Service Changes, 2006**

Docket No. N2006-1

**INTERROGATORIES OF AMERICAN POSTAL WORKERS UNION, AFL-CIO TO
USPS WITNESS WILLIAMS (APWU/USPS T2-64-74)
(May 15, 2006)**

Pursuant to Rules 25, 26, and 27 of the Rules of Practice, The American Postal Workers Union, AFL-CIO directs the following interrogatories to USPS witness David E. Williams. If the witness is unable to respond to any interrogatory, APWU requests that a response be provided by an appropriate person capable of providing an answer.

Respectfully submitted,

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APWU/USPS-T2-64 Please provide a schedule that lists the due dates for all the Post Implementation Reviews on all the AMPs submitted in Library Reference N2006-1/5 and the schedule for Post Implementation Reviews for the Marina AMP.

APWU/USPS-T2-65 In your testimony you state that after the suspension of AMPs was lifted “District offices were directed to reevaluate their proposals to ensure that they fit within the future network strategy.”

- a) What information about the network strategy did District offices receive that allowed them to reevaluate their proposals?
- b) Which office in the Postal Service provided them with that information?
- c) When were District offices briefed on this network strategy?
- d) Were District offices provided with END model simulation results?
- e) If Districts received END model simulation results, were they asked to evaluate those results?

APWU/USPS-T2-66 In response to APWU./USPS-T2-5 you state “As the Postal Service at headquarters began to focus more on the prospect of a major network realignment, my staff has routinely discussed the AMP process with field managers and explained its purpose.”

- a) Were you and your staff providing information about the network reorganization strategy in these discussions or only about the AMP process?
- b) If you were not providing information about the network reorganization strategy, what goals were provided to field managers to help them make a decision about whether to file an AMP or not?

APWU/USPS-T2-67 On page 11 of your testimony you state that one of the general principles the Postal Service expects to abide by in the AMP process is “consideration of locally-developed alternative network realignment proposals and changes in the application of service standards.”

- a) From whom do these alternative network realignment proposals come?
- b) In the various recent lists of AMPs, there are cases where the same facility is shown attached to differing facilities into which the facility’s mail would be consolidated. Is this an example of an alternative network realignment proposal? If not, what prompts such a change in focus?

APWU/USPS-T2-68 In your experience has an AMP ever been reversed? Is there a process for such a reversal? If so, what factors prompt it?

APWU/USPS-T2-69 For the facilities listed in N2006-1/5 and those listed in N2006-1/11:

- a) Were all those facilities considered to be a DSCF prior to the AMPs? If not, please indicate which ones did have that status.
- b) Did any of those facilities lose their DSCF status when their originating mail was moved to the AMP facility? If so please identify the facilities.

- c) For facilities that did not lose their DSCF status when their originating mail was moved to the AMP facility, does the mail that is dropped at the facility go directly to incoming processing?
- d) Did any of the facilities in N2006-1/5 or N2006-1/11 have Bulk Mail Entry Units? If so, which ones?
- e) Did any of those facilities have their BMEU closed as a result of the AMP process? If so please identify which facilities.
- f) For those facilities that still have an operating BMEU, please describe what happens to the bulk mail entered there. Does the office continue to process the bulk mail through its outgoing operations? Does some or all the mail move to the AMPC for outgoing processing? If any mail is sent to the AMPC for processing, is destinating mail segregated out before sending mail to the AMPC?

APWU/USPS-T2-70 For facilities listed in N2006-1/5 and those in N2006-1/11 that lost their originating mail, are they now Destination Processing Centers? If not, why not.

APWU/USPS-T2-71 For facilities in N2006-1/11 with destinating mail impacted by the AMP, what is the current status of those facilities?

APWU/USPS-T2-72 Some worksheets in N2006-1/11 are not filled out. For example, in only one case were worksheets 10a and 10b completed. Is it not requirement to complete all the worksheets? If it is not required, how do higher levels of management assess and approve the AMPs?

APWU/USPS-T2-73 One of the AMP worksheets indicates changes that will be necessary in labeling if the AMP is implemented (Worksheet 8). Does the Postal Service anticipate other types of changes to mail preparation requirements (for any class of mail) related to the overall network reorganization? If so, please identify them.

APWU/USPS-T2-74 Please clarify your response to APWU/USPS-T2-24 (d).

- a) When you state that the ADC structure is part of the END baseline data what exactly do you mean? Will there still be facilities designated as ADCs in the realigned network?
- b) Why does the Postal Service not consider changes in ADC assignments as part of the END process?