

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

**REQUEST OF THE UNITED STATES POSTAL SERVICE
FOR AN ADVISORY OPINION ON CHANGES IN
POSTAL SERVICES**

Docket No. N2006-1

**SECOND SET OF INTERROGATORIES OF
THE ASSOCIATION FOR POSTAL COMMERCE
TO USPS WITNESS DAVID E. WILLIAMS**

(POSTCOM/USPS-T2-4 - 13)

Pursuant to Sections 25 through 27 of the rules of practice, the Association for Postal Commerce directs the attached Second Set of Interrogatories to Witness David E. Williams. If the witness is unable to respond to any interrogatory or request for production of documents, PostCom requests that a response be otherwise provided by the Postal Service.

Respectfully submitted,

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POSTCOM/USPS-T2-4. The USPS Area Mail Processing Communications Plan, USPS Library Reference N2006-1/4 , identifies three events that trigger various communication responsibilities. The responsibilities are triggered upon:

1. a decision to undertake a feasibility study;
 2. completion of a feasibility study and approval decision to consolidate mail processing operations; and
 3. completed transfer of mail processing operations.
- a. Does the Postal Service have an Area Mail Processing Communications Plan *upon implementation*? If so, please provide a copy. If not, why not?
 - b. What forms of communications are *available to the Postal Service* to inform mailers of anticipated and effective changes in bulk mail entry locations, mail preparation or entry requirements, and any other changes in mail processing operations that affect mailers?
 - c. What forms of communications are *used by the Postal Service* to inform mailers of anticipated and effective changes in bulk mail entry locations, mail preparation or entry requirements, and any other changes in mail processing operations that affect mailers?
 - d. Will the Postal Service develop a communications plan for each approved AMP consolidation decision in the future, to inform mailers of anticipated and effective changes in bulk mail entry locations, mail preparation or entry requirements, and any other changes in mail processing operations that affect mailers? If not, why not?

POSTCOM/USPS-T2-5. Please describe all the ways the Postal Service communicates with mailers regarding changes in its operations during the implementation of mail processing consolidations.

POSTCOM/USPS-T2-6. Please explain how the Postal Service evaluates the effectiveness of its communications with mailers regarding changes in its operations during the implementation of mail processing consolidations.

POSTCOM/USPS-T2-7. Does the Postal Service collect or maintain any data or records (e.g., FAST) that would indicate whether or not a particular truck appointment of a mailer or mail service provider was honored by the mailer or by the Postal Service at a particular Postal Service facility? If so, please describe these data or records, including providing complete record layouts, and a data dictionary.

POSTCOM/USPS-T2-8. If the answer to POSTCOM USPS-T2-7 is in the affirmative, please explain how that data is used.

POSTCOM/USPS-T2-9. Does the Postal Service collect or maintain any data or records that would indicate whether, upon the arrival of a truck at a location consistent with a scheduled appointment, that truck was sent to another location for mail entry, acceptance, or processing?

POSTCOM/USPS-T2-10. If the answer to POSTCOM USPS-T2-9 is in the affirmative, please provide electronic copies of such data for FY2005.

POSTCOM/USPS-T2-11. Please identify and describe all the sources of Postal Service data or information that mailers use in the course of mail preparation or entry that may potentially need to be changed or updated as a result of an AMP implementation or consolidation. Please describe the content and use of each source or dataset. (For example, some of these sources may include the following: the "dropship" file; "ZIP/CIN" file; "DEPS", electronic labeling lists; FAST destinations/redirections)

POSTCOM/USPS-T2-12. Please provide copies of the Postal Service's plans and procedures for ensuring that each of these sources are updated on a timely basis to ensure that mail can be and is prepared in a manner that conforms to the reconfigured network.

POSTCOM/USPS-T2-13. Please indicate how much notice prior to implementation of each approved AMP consolidation will be given to mailers entering mail at each facility that has been affected by that consolidation.