

**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 T2-79-83)
(May 22, 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-T2-79 In Library Reference N2006-1/3, the Post Implementation Review process is described as having the appropriate management personnel fill out the same worksheets that are filled out for the AMP process, skipping worksheets 3 and 8.

- a) Where in this process does the Postal Service assess whether the service standards expected at the time of the consolidation are actually being met?
- b) Why are managers directed not to fill out Worksheet 8, which seems to be asking about the impact on service commitments for mail classes other than First Class mail?
- c) Is there a requirement in this process that management personnel assess whether the service standards set for First Class mail are actually being met after the consolidation takes place?
- d) If so, what data are used to make that assessment and where is it reported in the PIR?
- e) If not, why is such an assessment not required?
- f) Where in the PIR process are capacity constraints or bottlenecks at the gaining plant listed and assessed?
- g) Where in the PIR process are impacts on carrier dispatch times in ZIP codes whose originating mail has been moved listed and the service impacts assessed?
- h) Where in the PIR process are actual transportation bottlenecks or changes in pick-up and delivery schedules reported and assessed?
- i) Where in the PIR process are problems reported by customers after the consolidation reported and assessed?

APWU/USPS-T2-80 In your response to VP/USPS-T2-6, you state “the Postal Service will be able in the future to monitor originating and destinating service performance scores for Performance Clusters covered by EXFC, as well as ODIS time-in-transit data for all 3-digit ZIP Code pairs, irrespective of whether Performance Clusters or 3-digit ZIP Code pairs were the subject of a consolidation decision.”

- a) Is there any requirement, as part of the AMP review process, that a comparison be made of EXFC and ODIS time-in-transit performance measures of consolidated ZIP code mail before and after consolidation? If so, please describe that requirement and how it is reported to the management team that is assessing the success of individual AMPs.
- b) Do these only apply to First Class mail? If not, what other classes of mail can be assessed through this process?
- c) Please describe ODIS time-in-transit data including mail classes covered.

APWU/USPS-T2-81 As part of the assessment of the AMPs listed in Library Reference N2006-1/11, has an assessment been made of changes in the EXFC scores for those areas that were impacted by those consolidations? If so, what were the findings?

APWU/USPS-T2-82 Will your team, as part of its assessment of the success of the AMP process within the END framework, compare the scores generated by any of the above mentioned performance monitoring procedures for the impacted ZIP codes of your test AMPs (listed in LR N2006-1/5)? If so, what sort of an assessment will you make and when? If not, why not?

APWU/USPS-T2-83 In your response to VP/USPS-T2-3, you state that consolidations do not diminish the ROI for equipment formerly used for outgoing operations because the “excess equipment at consolidated facilities will be relocated to where it can be better utilized.” Where in the review process for AMPs is there an assessment as to whether the equipment is being better utilized? Please describe the data and comparisons used in this assessment.