

**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
THE UNITED STATES POSTAL SERVICE (APWU/USPS-6-8)
(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 the United States Postal Service.

Respectfully submitted,

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APWU/USPS-6 Library Reference N2006-1/13 is the powerpoint presentation used at the town hall meeting held in Sioux City, IA on April 20, 2006.

- a) Please confirm that subsequent to the town hall meeting that is the subject of Library Reference N2006-1/13, an additional meeting was held to brief selected participants on the proposed consolidation in Sioux City, IA.
- b) How were the participants selected?
- c) Please list who was in attendance at this meeting.
- d) Please confirm that participants in the meeting signed agreements not to disclose information shared in this briefing.
- e) What subjects were discussed in this meeting?
- f) Please state the nature of the information disclosed at this meeting that the Postal Service concluded should be protected by a nondisclosure agreement.
- g) Why was the nondisclosure agreement was considered necessary?

APWU/USPS-7 In Library Reference N2006-1/13, page 16, it states that “no decisions have been made...”

- a) Please refer to page 15, which states “Many scenarios proposed. To determine which to study, we consider... .” Please confirm that by the date of this presentation, April 20, 2006, the Postal Service had considered alternatives and had already decided which alternatives would be the subject of the AMP study.
- b) Please refer to Library Reference N2006-1/13 pages 10-14, and 18
 - i. Please confirm that the factual statements made on these pages were based on information obtained from the AMP study.
 - ii. Please provide the date the Sioux City, IA AMP study was completed.
 - iii. If subpart i is not confirmed, please describe any work or missing data relied upon to complete the AMP worksheets.
- c) Please confirm that by the April 20, 2006, the date of the Sioux City, IA presentation, the AMP was being recommended to higher level management for their review. If not confirmed, please describe exactly where this AMP was in the process and identify when the local team completed the AMP worksheets. Please identify when this recommendation was made and what did the local team recommend?

APWU/USPS-8 Please refer to OCA/USPS-33(a).

- a) Did a postal employee take notes at the Sioux City Town Hall meeting? If so, what action items or citizen/mailler concerns were recorded by the Postal Service?
- b) Did any input from participants in the town hall meeting result in further study, review of data, etc.?
- c) Did the Postal Service make any changes as a result?