

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

Request of the United States )  
For an Advisory Opinion ) Docket No. N2006-1  
On Changes in Postal Service )

NATIONAL NEWSPAPER ASSOCIATION INTERROGATORIES TO  
UNITED STATES POSTAL SERVICE WITNESS DAVID WILLIAMS  
(NNA/USPS T2-1-20)  
May 23, 2006

Pursuant to the Commission's Rules, National Newspaper Association hereby submits interrogatories to United States Postal Service David Williams and requests full and complete responses. If the witness is not able to respond to any interrogatory, the witness is requested to refer the interrogatory to the United States Postal Service for a response by a competent witness.

Respectfully submitted,

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May 23, 2006

**NNA/USPS T2-1** In your testimony on pg. 3 you said local AMP studies are typically initiated when a District Office or Processing & Distribution Center (P&DC) management decides service or efficiency could be improved through consolidation. Are AMP studies ever initiated in whole or in part through any of the following:

- a. an order from Postal Service headquarters
- b. purely to improve service—without regard to efficiency gains—in an area where service had deteriorated
- c. a requirement from officials senior to a district office or a P&DC manager to cut expenses

**NNA/USPS T2-2** Please refer to LR 1/3, pages 1 and 6 and Worksheet 1. Would the lack of consent by the manager of a facility proposed for consolidation be sufficient to halt consideration of an AMP?

**NNA/USPS T2-3** Would the manager of a facility that might be closed or significantly downsized by an AMP consolidation have a personal or professional disincentive to propose and/or consent to a consolidation? If so, how does the Postal Service overcome the resistance of a manager to possibly losing his job or managerial post?

**NNA/USPS T2-4** What financial or career incentives do managers have to initiate an AMP proposal?

**NNA/USPS T2-5** You refer to the use of press releases to notify local news media throughout your testimony and interrogatory responses. Please confirm that:

- a. 'press release' is an announcement by the Postal Service intended to be used in news columns or broadcasts;
- b. news media are free to use, edit or ignore press releases
- c. the Postal Service typically does not purchase paid advertisements to ensure that its message about AMP consolidation reaches citizens.

**NNA/USPS T2-6** Please refer to your response to APWU/USPS T2-7.

- a. Does your response mean that local/district managers have complete discretion in choosing which media or members of the general public receive information about a planned AMP process and/or a result?
- b. Do these managers also have the discretion to disseminate no information?

**NNA/USPS T2-7** Has the Postal Service discussed with these managers any criteria or guidelines in how to select which types of information are disseminated, and to whom? If so, please describe or provide copies of written criteria or guidelines. If not, please explain why the Postal Service has determined that these local/district managers are qualified to make these communications decisions.

**NNA/USPS T2-8** Does the Postal Service publicize its AMP plans to communities surrounding a facility planned for consolidation into another gaining facility as well as those in the city where the consolidated facility is sited, such as in surrounding suburbs or small towns where mail volumes that otherwise might be transported to the effected facility? If your response is yes, please explain how the Postal Service identifies the media to be contacted? If your response is no, please explain why not.

**NNA/USPS T2-9** Please refer to your statements on p. 14 on the importance of communications with “impacted business mailers” and “local major customers.” With respect to direct communications made to business mailers:

- a. How large must a “major” customer be to receive direct notice of a potential mail entry and processing change?
- b. Who determines which customers are “major?”
- c. Would a local newspaper whose primary circulation method involves distribution through an affected facility be considered a “major” customer?
- d. Would a publisher whose mail is considered “hot mail” by a facility typically receive a direct contact with regard to the planned changes?
- e. Would the Postal Service consider a news release intended for the general public to be sufficient notification of the planned changes for a local newspaper mailers?
- f. Do press releases distributed to the general public discuss any anticipated downgrades of service to any mail class?
- g. Do Postal Service officials when conducting a public meeting discuss any anticipated downgrades of service to any mail class?

- h. Do contacts with “major customers” or BSN customers by Postal Service officials discuss any anticipated downgrades of service to any mail class?**

**NNA/USPS T2-10 Are Postal Service personnel outside the Communications Group mentioned in your testimony, such as BME staff, encouraged to or discouraged from discussing the AMP plans with mailers with whom they are in contact, if the personnel are aware of the analysis or plans to move forward?**

**NNA/USPS T2-11 Please refer to your response to APWU/USPS 18e. Please confirm that [www.usps.com](http://www.usps.com) contains a link to a page entitled “Contact us” with a response form under a further page linked to “email us.” If a member of the public commented upon an AMP proposal through this means, would the comment be included in the Headquarters review of the AMP proposal?**

**NNA/USPS T2-12 Please explain what response a member of the public would most likely receive if he or she contacted the Postal Service to complain about a service disruption that resulted either temporarily from an AMP reorganization or permanently because of reorientation of the service expected between two 3-digit pairs if the complaint came through:**

- a. The USPS website**
- b. 1 800 ASK USPS**
- c. Consumer affairs personnel at USPS**
- d. A member of Congress to the Communications Group**

**NNA/USPS T2-13 Does the Postal Service measure or factor in the cost of handling stakeholder, customer or consumer complaints resulting from service disruption as a part of the cost/savings in a consolidation, either within the AMP calculations or in final deliberations?**

**NNA/USPS T2-14 To your knowledge, has an AMP ever been reversed solely because of service considerations?**

**NNA/USPS T2-15 In previous AMPs that resulted in a consolidation:**

- a. did local mailers affected by a consolidation always retain access to a BMEU at the consolidated facility?**
- b. If not, how does the Postal Service consider the effect upon mailers’ costs in hauling mail for entry over longer distances?**

- c. In the AMPs now under consideration in the END analysis, will mailers always retain access to a local BMEU? If not, how will the Postal Service factor in the additional transportation costs of mailers that previously used a BMEU at the consolidated facility?

**NNA/USPS T2-16** Please refer to your response to APWU/USPS T2-15d. Does the Postal Service have any mechanism for considering the burdens upon mailers imposed by a consolidation, either through qualitative evaluation, an AMP input or customer commentary?

**NNA/USPS T2-17** Please refer to your response to APWU/USPS T2-16. In addition to considering the impact a mailer's volumes might have upon a facility, if a local/district manager is aware of a mailer whose critical entry times might be negatively impacted by a consolidation of originating mail processing—such as a local newspaper dependent upon timely delivery—would you expect that manager to provide notice to that mailer? If not, how would such a mailer receive notification of an AMP's initiation, conclusion or implementation? Assume for purposes of this question that the local mailer is not a newspaper targeted by those managers for a press release.

**NNA/USPS T2-18** Please refer to your response to OPA/USPS T1-17, which was redirected to you by witness Shah. Does your response mean that in every case where no First-Class Mail downgrades are expected to occur, neither will periodicals downgrades will be expected? If your response is negative, please explain:

- a. in what circumstances you would expect periodicals service to be affected differently
- b. how the Postal Service would measure the anticipated differences?
- c. whether the Postal Service would communicate that expectation to the periodicals mailer;
- d. how communications to that periodicals mailer would typically be handled if the mailer was not considered a "major customer" or was not a part of the BSN

**NNA/USPS T2-19.** Please refer to the worksheets in LR 1/5, enumerated pages 000005 referring to the Pasadena-Santa Clarita AMP, 00027, referring to the Olympia AMP, page 00049, referring to the Waterbury-Southern Connecticut AMP, page 00068, referring to the Bridgeport-

**Stamford Connecticut AMP, page 00085, referring to the Greensburg-Pittsburgh AMP, page 000099, referring to the Trenton-Kilmer AMP, 000134 referring to the Northwest Boston P&DC, pg 000140 referring to the Kinston-Fayetteville AMP, pg 000155 referring to the Marysville-Sacramento AMP and page 000172, referring to the Mojave- Bakersfield AMP.**

- a. Please confirm that the newspapers contacted in each of these AMP plans as media contacts were daily newspapers, and not community weekly newspapers.**
- b. Did the contacts involve only news dissemination or did they also encompass discussions of the effect of the AMP changes upon that newspaper's own mail?**

**NNA/USPS T2-20. Please refer to LR 1/5 with reference to the Marysville – Sacramento AMP, particularly with respect to the assumptions page 000168.**

- a. Was the Marysville P&DF closed or will it be closed as a result of the approval of this AMP?**
- b. If it remains/will remain open, how will the UFSM 1000 proposed to be transferred to that facility be used? If your response is that it will be used for destinating mail, is there also an AFSM 100 in that plant? Has the Postal Service determined that sufficient destinating flat mail that can be run on a UFSM 1000 will remain in that plant to justify the use of that machine?**