

**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 T2-84-89)
(May 31, 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-T2-84 Decisions have been reached on at least seven of the AMPs listed at the end of your testimony. Please provide complete AMP documentation on all AMPs from that list where a decision has been reached. In those cases where the decision has been to not move forward with the consolidation please provide the factors that determined those decisions.

APWU/USPS-T2-85 Please clarify your response to APWU/USPS-T2-62 (b) and your response to APWU/USPS-T2-1 (f) [revised]. What was the final decision on the Pendleton OR PO into Pasco, WA P&DF AMP and when was that decision reached?

APWU/USPS-T2-86 Please clarify your response to APWU/USPS-T2-59 (a) in the context of Mr. Shah's response to APWU/USPS-T1-10 (b). Will the Detroit BMC be converted to an RDC?

APWU/USPS-T2-87 Please clarify your response to APWU/USPS-T2-59 (b), (d) and (f).

- a) Please confirm that the cost savings from moving the originating mail from Troy, Pontiac, Royal Oak, Detroit and Flint were included in the cost savings provided in the Decision Analysis Report that the Postal Board of Governors used as the basis for its decision to build the NE Michigan facility.
- b) The NE Michigan facility will not be completed for probably two years. Why are the AMPs being conducted now?
- c) Will changes in mail volume and mail patterns between now and the time the NE Michigan facility could be opened be factored into the AMP process?
- d) What factors could the AMP process bring to light that would prompt a decision different from the one management has already assumed in the Decision Analysis Report for this project?

APWU/USPS-T2-88 In follow-up to your response to APWU/USPS-T2-62 (b),

- a) When was it discovered that the PIRs for the 2004 AMPs had not been completed according to the schedule in the AMP Guidelines Handbook?
- b) What is the position occupied by the person whose responsibility it is to assure the AMP processes and procedures are followed?

APWU/USPS-T2-89 In follow-up to your response to APWU/USPS-T2-63 (c), why did the local and district area decide to not move forward with those AMPs? What factors determine a negative decision in the AMP process?