

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

EVOLUTIONARY NETWORK DEVELOPMENT
SERVICE CHANGES, 2006

Docket No. N2006-1

RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS SHAH
TO APWU INTERROGATORIES APWU/USPS-T1-22 THROUGH 30
(June 5, 2006)

The United States Postal Service hereby submits the responses of witness Pranab Shah to the following interrogatories of the American Postal Workers Union: APWU/USPS-T1-22 through 25 (filed on May 10, 2006); and APWU/USPS-T1-26 through 30 (filed on May 22, 2006).

Each interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS SHAH
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APWU/USPS-T1-22. With reference to the new NE Michigan facility and the new Oklahoma City facility recently approved by the Postal Board of Governors:

- a) Will both of those facilities be Postal owned? If not, why not?
- b) Will those facilities be built to a standardized footprint(s)?
- c) If so, is there an existing Postal facility or facilities that will be used as a model for that standardization?
- d) Please identify facilities that are used as such standardized models.
- e) If these facilities are not being built to a standardized footprint why not?

RESPONSE:

- (a) Yes.
- (b) While the exact OSL layout of each new facility will be unique, the objective is to create standardized mail flows and operational space requirements in our future new facilities.
- (c)-(e) This is to be determined.

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APWU/USPS-T1-23. In general, how are facilities that have not yet been constructed handled in the context of the END models? Please include in your response not only the new processing facilities such as those mentioned above but also new Surface Transfer Centers and other types of facilities.

a) How is the facility specific data such as volume, zip code assignments, workroom and platform square footage, workload and productivity and capacity determined and assigned in the model?

b) Does the distribution concept used in the END models already make the assumption that these facilities will exist in a specific location or is there a process whereby the model indicates the need for a facility in a specific location?

RESPONSE:

(a-b) New facilities that have not yet been constructed are not handled in the context of the END models. The model takes existing infrastructure points to specific location and quantities based on workload.

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APWU/USPS-T1-24. To clarify your response to APWU/USPS-T1-19 (b), you state that three of the new Surface Transfer Centers identified by Mr. Vogel are new facilities:

- a) Are those facilities newly built by the Postal Service?
- b) If so, are those facilities built using a standardized footprint for such facilities?
- c) If these facilities are not newly built facilities, are they newly leased facilities? If so, will they be renovated to a standardized footprint?
- d) If these facilities are not newly built or newly leased please indicate in what way they are new to the Postal Service network.

RESPONSE:

(a)-(b) No.

(c) Yes.

(d) N/A

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APWU/USPS-T1-25. In your response to APWU/USPS-T1-21 please clarify the following:

- a) Is there a currently used “RDC planning concept document” or is this document only in the planning stages now?
- b) Is this planning concept document primarily going to be used to plan the transition of a facility to an RDC facility after it has been decided that a facility will become an RDC or does it incorporate the process by which a decision is made about whether a facility should become an RDC?
- c) If it is the decision-making process and it is only now being developed, how have the RDCs that are already identified been determined?
- d) You refer to an “RDC Activation Communications Plan” that is currently under development. Will that plan be part of the Postal Service’s recently announced “Public Input Process” communications plan (PIP) or are these separate communications plans?

RESPONSE:

- (a) The document is being developed.
- (b) This document is intended to be a network transition and implementation document.
- (c) While some candidate facility types have been identified as potential RDCs, the Postal Service has not yet determined which of those facilities will end up as RDCs.
- (d) I am informed that they will be separate.

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APWU/USPS-T1-26. Have the USPS' Postal Customer Councils been asked to provide input into the network plan in general? Are the Councils in cities where changes are planned been notified of those changes and their input sought?

RESPONSE:

No.

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APWU/USPS-T1-27. The following document is from the web site the Postal Service maintains for the purpose of remaining in contact with the MTAC mailers. This particular document can be found at <http://ribbs.usps.gov/mtac.htm> and is called MTACRIBBS.doc:

As per an earlier agreement with MTAC Workgroup, Issue 60, the USPS office of Integrated Network Development will be posting advance notice of planned adjustments to First Class Mail Service Standards under the "File Libraries" link on the RIBBS Home Page (<http://ribbs.usps.gov/>). After clicking-on the "File Libraries" link (<http://ribbs.usps.gov/files/>), then an MTAC user can click-on the Service Standards link, which will then lead them to a page which will display links to all the files which have been posted in anticipation of First-Class Mail Service Standard changes.

This information is scheduled to be posted 30 days prior to the start of a Postal Quarter. If no Service Standard changes are anticipated, a "No Scheduled Updates" notice will be posted.

If any MTAC member would like to submit comments, or concerns, regarding any announced FCM Service Standard changes posted on this site, please submit your comments, within 10 days of the posting, by clicking-on the following Email link:

Email Comments to servicestandards@email.usps.gov

Thank You.

Integrated Network Development
May 10, 2002"

- a) Is the office of Integrated Network Development, mentioned in this document, the subgroup of your office identified in your response to APWU/USPS T1-2 (c)?
- b) What is the role of this office in the END (formerly NIA) process?
- c) This document directs MTAC mailers to submit comments on First Class service standard changes as identified through this process. Are other mailers also allowed to submit comments through this mechanism?
- d) What happens to the comments that are received through this e-mail address?
- e) This document states that this information will be posted 30 days prior to the start of each Postal quarter yet the last posting was made on September 30, 2005. Please explain why these postings have not been updated since then.

RESPONSE:

- (a) Yes

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RESPONSE to APWU/USPS-T1-27 (continued):

- (b) Integrated Network Development provides current baseline service standard information to END and assists in analysis of service standard impacts associated with AMP proposals, or other changes to the facilities in which mail is processed.
- (c) While only First-Class Mail changes are posted on the RIBBS site, Integrated Network Development would respond to anyone who writes to servicestandards@email.usps.gov with a legitimate Service Standards-related question. However, it should be noted that, since activation, such inquiries have been rare (although thousands of SPAM messages have been received at the site).
- (d) Depending on the topic, they would be forwarded to an appropriate functional area for research, but the inquirer would ultimately be responded to by Integrated Network Development.
- (e) There were no First-Class Mail Service Standard changes implemented January 1, 2006 (PQ 2-06). However, there were First-Class Mail changes implemented at the start of PQ 3-06 on April 1, 2006, which were not finalized until the day before implementation. The failure to post these changes on RIBBS was an oversight.

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APWU/USPS-T1-28. In your response to VP/USPS-T1-15, you state that there is no system in place for measuring service performance for Standard mail. How will your office and other management teams assess whether changes made through network realignment have an unacceptable negative impact on those classes of mail without formal performance measures?

RESPONSE:

In such circumstances, postal managers will have to rely, as they do today, on daily mail condition reports and mailer feedback.

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APWU/USPS-T1-29 Does the END modeling process use any data that assesses actual service performance for any class of mail or does it only use service standards?

Response:

The END models use existing service standards.

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APWU/USPS-T1-30. Please clarify your response to PB/USPS T1-8. Is single-piece in your response a description of a rate category of mail or a physical description of the mail?

RESPONSE:

It is a physical description, not a rate category.