

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

EVOLUTIONARY NETWORK DEVELOPMENT  
SERVICE CHANGES, 2006

Docket No. N2006-1

RESPONSES OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES THE AMERICAN POSTAL WORKERS UNION  
(APWU/USPS-6 THROUGH 8)  
(June 5, 2006)

The United States Postal Service hereby submits its responses to the following interrogatories of the American Postal Workers Union, filed on May 22, 2006:

APWU/USPS-6 through 8.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux  
Chief Counsel, Ratemaking

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Michael T. Tidwell

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2998; Fax -5402  
michael.t.tidwell@usps.gov

**RESPONSE OF THE UNITED STATES POSTAL SERVICE TO  
INTERROGATORY OF THE AMERICAN POSTAL WORKERS UNION**

**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 considered necessary?

**RESPONSE**

(a) Confirmed.

(b-c) The Postal Service was asked by members of the Iowa U.S. Congressional delegation if it would agree to meet with a civic delegation from Sioux City, consisting of the Mayor, an executive from the local Chamber of Commerce, and two consultants (one a logistics manager and the other a certified public accountant). In addition, there was a staff member from each Iowa U.S. Senate office and one from an Iowa U.S. House of Representatives office. The Postal Service is not privy to the criteria that may have been used to determine the membership of the delegation. Also in attendance was the USPS Hawkeye District Manager, as well as USPS Headquarters personnel from Operations, Government Relations, and the Law Department.

(d) Confirmed.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE TO  
INTERROGATORY OF THE AMERICAN POSTAL WORKERS UNION**

**RESPONSE to APWU/USPS-6 (continued):**

- (e) The topics included goals of Evolutionary Network Development, the AMP process, the Sioux City AMP proposal summary that had been presented at the town hall meeting, postal operations in the Hawkeye District, concerns the delegation had about the potential impact the Sioux City AMP might have on overnight First-Class Mail service and on relocation of postal employees.
- (f) Pre-decisional analyses and opinions of postal employees involved in the AMP process and commercially-sensitive volume and service data.
- (g) The Postal Service considers the information described in response to subpart (f) to be exempted from mandatory public disclosure by operation of the Freedom of Information Act.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE TO  
INTERROGATORY OF THE AMERICAN POSTAL WORKERS UNION**

**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?

**RESPONSE**

- (a) Confirmed that the Sioux City AMP consolidation proposal summarized at the town hall meeting emerged from a process in which alternative consolidation proposals were not selected for AMP analysis. As of April 20<sup>th</sup> and as of the date of this response, no decision has been made regarding whether to approve that proposal.
- (b)
  - (i) Confirmed, only in part. Bear in mind that the presentation by the District Manager is also based upon some facts within the scope of his knowledge that may not be reflected in the study.
  - (ii) The study is not complete until all pre-decisional work has ceased.
  - (iii) This question is not clear. The data relied upon to complete the Sioux City Worksheets can be presumed to be similar to the data reflected in AMP decision packages already on file in this docket.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE TO  
INTERROGATORY OF THE AMERICAN POSTAL WORKERS UNION**

**RESPONSE to APWU/USPS-7(continued):**

- (c) Development of Worksheets is an iterative process. At each level of review, Worksheets are subject to change until the point that a final decision is made. At the Headquarters review, those changes can involve the participation of “the local team.” Accordingly, in that sense, the local team’s work is often not complete until all pre-decisional work is complete. Thus, while the local team may initially submit a proposal on a given date, they also may be actively involved in conferring with subsequent review teams and developing revisions to the proposal, until all pre-decisional work has been completed. A summary of the proposal under consideration at Headquarters is reflected in the Library Reference – consolidation of originating operations from Sioux City IA to Sioux Falls SD, with no service downgrades. The Postal Service has no intention of isolating particular pre-decisional recommendations in any AMP decision package and identifying them on the basis of whether they first originated at the District, Area or Headquarters level or by whom they were originated.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE TO  
INTERROGATORY OF THE AMERICAN POSTAL WORKERS UNION**

**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?

**RESPONSE**

- (a) Yes. Concerns were expressed regarding such matters postal personnel impacts; distrust of postal management, postmarking of mail; whether there would be service standard changes; quality of local First-Class Mail service, impact of weather and brush fires on postal transportation operations; the impact of the proposed consolidation on community identity; local economic activity and cultural marketing plans, and whether the Postal Service would consider consolidating postal operations from other locations into Sioux City.
- (b) A final decision is currently pending on the Sioux City AMP proposal. The Postal Service is reviewing the town hall summary as part of it final analysis of that AMP proposal.
- (c) Please see the response to subpart (b). It is within the sole discretion of the Postal Service to determine if a final AMP decision document will reflect whether any changes in the AMP proposal that was submitted for review were prompted by (1) a particular postal analyst, (2) by a particular postal administrative unit or department, (3) by consideration of concerns expressed at a town hall meeting, or (4) in response to a solicitation for written comment.