

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

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**Evolutionary Network Development  
Service Changes, 2006**

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**Docket No. N2006-1**

**INTERROGATORIES OF AMERICAN POSTAL WORKERS UNION, AFL-CIO TO  
USPS WITNESS WILLIAMS (APWU/USPS T2-90-97)  
(June 8, 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-T2-90 Which parts of the Area Mail Processing Notifications Tool Kit presented in Library Reference N2006-1/12 have been used for the AMPs presented in Library Reference N2006-1/5? Which parts of it were used for the AMPs presented in Library Reference N2006-1/11?

APWU/USPS-T2-91 What are the USPS' goals in using the documents presented in Library Reference N2006-1/12? What information is it hoping to convey and what type of input is it hoping to solicit from the mail-using stakeholders?

APWU/USPS-T2-92 Have the documents in the Notification Tool Kit that are marked for "media" or "community leaders/organizations" been tested to see how well they are understood by those groups? In particular are those groups familiar enough with phrases such as "originating, destinating, originating/destinating" mail to have an accurate understanding of what actions are being proposed?

APWU/USPS-T2-93 What information is included in the "AMP Summary Brief" that is going to be attached to some of the documents in the Notification Tool Kit? Is that the same as the "Executive Summary" page in the AMP package or something different? Please provide an example if it is not a document that has already been provided.

APWU/USPS-T2-94 Are these documents suggestions or are they expected to be used verbatim except for the places where it is clearly expected that information such as the facility names, dates, etc. are to be filled in?

APWU/USPS-T2-95 When are the documents contained in the Public Input Process section of the Notifications Tool Kit (pages 16-21 of LR N2006-1/12) distributed in relation to the public meetings? Specifically, how much notice is given to interested parties in advance of these public meetings?

APWU/USPS-T2-96 According to the timeline provided on pages 4 and 5 of LR N2006-1/12, upon completion of the AMP study, a "public input process summary is completed and submitted to HQ." What information is contained in the "public input process summary?" Is there a specific "public input process summary" document, worksheet or form that is completed? If so, please provide a copy of this document. If not, please explain why there is no uniform way to summarize public comment and concerns.

APWU/USPS-T2-97 The Notifications Tool Kit contains notices that seemingly address every possible outcome of an AMP study, i.e. notice of a decision to consolidate, to close, or to take no action regarding a particular facility. Yet the notices contained on page 8 and page 10 of LR N2006-1/12, states "I will provide you with appropriate notice, if any is required, when a decision is made on the study results." When is notice deemed to be required? Are there situations in which no further information is provided about an AMP study once the initial notice of intent to conduct a study has been given? If so, please explain.