

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

EVOLUTIONARY NETWORK DEVELOPMENT
SERVICE CHANGES, 2006

Docket No. N2006-1

REVISED RESPONSES OF
UNITED STATES POSTAL SERVICE WITNESS WILLIAMS
TO APWU INTERROGATORIES (APWU/USPS-T2-64 THROUGH 74
(July 11, 2006) [ERRATA]

The United States Postal Service hereby submits the revised responses of witness Williams to the following interrogatories of the American Postal Workers Union: APWU/USPS-T2-64 through 74. The revisions correct minor typographical errors in the responses to T2-65(c) and T2-74(b), and correct the captions at the top of each page to reflect that the answers are being provided by witness Williams. There are no substantive changes in the responses. The revised responses supersede the original responses filed on June 1, 2006.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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

APWU/USPS-T2-64 Please provide a schedule that lists the due dates for all the Post Implementation Reviews on all the AMPs submitted in Library Reference N2006-1/5 and the schedule for Post Implementation Reviews for the Marina AMP.

RESPONSE:

Preliminary AMP PIR documents are due for review at headquarters as follows:

April 30, 2006	Marina, CA	The Headquarters PIR of Marina is nearing completion.
October 30, 2006	Greensburg, PA Bridgeport, CT Waterbury, CT NW Boston, MA Marysville, CA	
January 30, 2007	Monmouth, NJ Mojave, CA Pasadena, CA Olympia, WA	
TBA	Kinston, NC AMP	(Date TBA once AMP fully implemented.)

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS WILLIAMS
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APWU/USPS-T2-65 In your testimony you state that after the suspension of AMPs was lifted “District offices were directed to reevaluate their proposals to ensure that they fit within the future network strategy.”

- a) What information about the network strategy did District offices receive that allowed them to reevaluate their proposals?
- b) Which office in the Postal Service provided them with that information?
- c) When were District offices briefed on this network strategy?
- d) Were District offices provided with END model simulation results?
- e) If Districts received END model simulation results, were they asked to evaluate those results?

RESPONSE

- a) They were informed of possible future network roles of the facilities involved in the AMP. If, hypothetically, a pending AMP consolidation proposal reflected a role for a facility for which it appeared not to be suited in the future network, the District would have been directed to consider an alternative consolidation proposal.
- b) Network Modeling and Development.
- c) District offices were informed of possible future network roles for facilities affected by an AMP when a particular AMP was being reviewed at Postal Service Headquarters. Overall Evolutionary Network Development strategy was not a focus of these briefings, as it was still being resolved at Headquarters at the time.
- d) No.
- e) Not applicable.

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APWU/USPS-T2-66 In response to APWU/USPS-T2-5 you state “As the Postal Service at headquarters began to focus more on the prospect of a major network realignment, my staff has routinely discussed the AMP process with field managers and explained its purpose.”

- a) Were you and your staff providing information about the network reorganization strategy in these discussions or only about the AMP process?
- b) If you were not providing information about the network reorganization strategy, what goals were provided to field managers to help them make a decision about whether to file an AMP or not?

RESPONSE

- a) My staff focused on training the area AMP coordinators' to follow the AMP Guidelines, Handbook PO-408 and helped several Areas set up similar training for other area and district personnel.
- b) District and area management were informed then that, if headquarters were to decide to adopt a centrally-directed approach to identifying AMP opportunities in the future (which has now occurred), they could expect to be contacted in connection with such a program and directed to initiate AMP studies. Otherwise, outside of that context, local managers can look to the PO-408 for guidance on whether to initiate an AMP study.

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APWU/USPS-T2-67 On page 11 of your testimony you state that one of the general principles the Postal Service expects to abide by in the AMP process is “consideration of locally-developed alternative network realignment proposals and changes in the application of service standards.”

- a) From whom do these alternative network realignment proposals come?
- b) In the various recent lists of AMPs, there are cases where the same facility is shown attached to differing facilities into which the facility’s mail would be consolidated. Is this an example of an alternative network realignment proposal? If not, what prompts such a change in focus?

RESPONSE

- a) Local, district, and/or area management.
- b) Yes. In a few AMP studies, a point has been reached during analysis that indicates a different gaining site should be considered.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS WILLIAMS
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APWU/USPS-T2-68 In your experience has an AMP ever been reversed? Is there a process for such a reversal? If so, what factors prompt it?

RESPONSE

I have had no experience with the reversal of an AMP. However, I am aware that the Hattiesburg, MS AMP was reversed in 1999. Chapter 6 of the PO-408, Reversal of Area Mail Processing, provides guidance on how to reverse AMP.

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APWU/USPS-T2-69 For the facilities listed in N2006-1/5 and those listed in N2006-1/11:

- a) Were all those facilities considered to be a DSCF prior to the AMPs? If not, please indicate which ones did have that status.
- b) Did any of those facilities lose their DSCF status when their originating mail was moved to the AMP facility? If so please identify the facilities.
- c) For facilities that did not lose their DSCF status when their originating mail was moved to the AMP facility, does the mail that is dropped at the facility go directly to incoming processing?
- d) Did any of the facilities in N2006-1/5 or N2006-1/11 have Bulk Mail Entry Units? If so, which ones?
- e) Did any of those facilities have their BMEU closed as a result of the AMP process? If so please identify which facilities.
- f) For those facilities that still have an operating BMEU, please describe what happens to the bulk mail entered there. Does the office continue to process the bulk mail through its outgoing operations? Does some or all the mail move to the AMPC for outgoing processing? If any mail is sent to the AMPC for processing, is destinating mail segregated out before sending mail to the AMPC?

RESPONSE

- a) All but Mojave.
- b) No.
- c) Properly identified DSCF mail dropped at the facilities goes to incoming operations.
- d) All.
- e) No.
- f) There are no outgoing processing operations at these facilities. Mail requiring outgoing processing is sent to the gaining facility. Destinating mail identified for DSCF is segregated.

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APWU/USPS-T2-70 For facilities listed in N2006-1/5 and those in N2006-1/11 that lost their originating mail, are they now Destination Processing Centers? If not, why not.

RESPONSE:

Although those facilities no longer process outgoing mail, as yet they have not assumed the future network facility type designation of a Destination Processing Centers.

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APWU/USPS-T2-71 For facilities in N2006-1/11 with destinating mail impacted by the AMP, what is the current status of those facilities?

RESPONSE:

Oil City, PA; Bradford, PA; and Du Bois, PA are post offices.

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APWU/USPS-T2-72 Some worksheets in N2006-1/11 are not filled out. For example, in only one case were worksheets 10a and 10b completed. Is it not requirement to complete all the worksheets? If it is not required, how do higher levels of management assess and approve the AMPs?

RESPONSE:

It was the practice in the past to leave worksheets blank if they were considered not pertinent to a particular study.

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APWU/USPS-T2-73 One of the AMP worksheets indicates changes that will be necessary in labeling if the AMP is implemented (Worksheet 8). Does the Postal Service anticipate other types of changes to mail preparation requirements (for any class of mail) related to the overall network reorganization? If so, please identify them.

RESPONSE:

If mail preparation changes will be required due to the network realignment, they have yet to be defined.

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APWU/USPS-T2-74 Please clarify your response to APWU/USPS-T2-24 (d).

- a) When you state that the ADC structure is part of the END baseline data what exactly do you mean? Will there still be facilities designated as ADCs in the realigned network?
- b) Why does the Postal Service not consider changes in ADC assignments as part of the END process?

RESPONSE:

- a. The current network, which includes ADCs, is the baseline from which change can be expected to occur. ADC is not a facility designation that is contemplated as part of the future network.
- b. To the extent that old role designations disappear and facilities take on new roles and designations as part of Evolutionary Network Development, it is all part of the same initiative.