

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 WILLIAMS
TO POSTCOM INTERROGATORIES
(POSTCOM/USPS-T2-14-20)

The United States Postal Service hereby submits the response of witness Williams to the following interrogatories of the Association for Postal Commerce, filed on June 14, 2006: POSTCOM/USPS-T2-14-20.

Each interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS WILLIAMS
TO INTERROGATORY OF POSTCOM**

POSTCOM/USPS-T2-14. Identify the complete set of Postal Service communication tools that would routinely need to be used or updated as a result of an ongoing and completed AMP consolidation.

RESPONSE

After publicizing a final AMP decision in accordance with the AMP

Communications Plan, the Postal Service has no plans to routinely issue public communications regarding the scheduling or completion of the numerous tasks associated with implementation of a particular consolidation decision. Thus, there is no plan to publicly announce the date on which, for instance, an AFCS is being moved from Plant A to Plant B, or the final inter-facility employee transfer has been completed. Accordingly, the Postal Service has not determined that it has a need to develop a set of communications tools for such purposes.

However, as it deems their use appropriate on a case-by-case basis, the Postal Service will use such communications tools as are listed in response to POSTCOM/USPS-T2-16.

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POSTCOM/USPS-T2-15. In your response to PostCom/USPS-T2-4(a) you state, " the Postal Service has not determined it needs to develop standardized plans to communicate all of the events that could be depicted in documents such as the attachment to the response to PostCom/USPS-T2-1(b&c)."

- a. What task names on the sample Master Gantt Chart implementation plan that you refer to describe the task of utilizing the forms of communication that you identify in response to PostCom/USPS-T2-4(b)?
- b. Does your response to PostCom/USPS-T2-4(b) suggest that the communication steps that need to be taken with mailers in order for mail to be prepared and entered correctly during and following the implementation of an AMP consolidation could and/or should be incorporated in a Gantt chart that is used to manage the implementation of an AMP consolidation? Please explain your response.

RESPONSE

- a. None.
- b. Yes. The Master Gantt Chart is a template. The project plan used during the Marina AMP illustrates how communication tasks were incorporated into the template.

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POSTCOM/USPS-T2-16. Identify the complete set of Postal Service departments and individuals responsible for or having ownership of each of the forms of communication and sources of data listed in response to T2-4 and T2-11.

RESPONSE

Below is a list of forms/sources of communication and the Headquarters units responsible for their management.

Form of Communication	Functional Responsibility
<i>Postal Bulletin</i>	Information Policies & Procedures – Public Affairs & Communications
<i>Domestic Mail Manual</i>	Mailing Standards, Pricing & Classification – Marketing
Press Releases	Public Affairs and Communication
DMM Advisory	Mailing Standards, Pricing & Classification –Marketing
Zone Charts	Address Management, Intelligent Mail & Address Quality
FAST	Logistics Systems, Network Operations Management
Business Mail 101	Mailing Standards, Pricing & Classification –Marketing
<i>Memo to Mailers</i>	Public Affairs and Communication
<i>Mailers Companion</i>	Implementation and Outreach, Pricing & Classification -- Marketing
usps.com	Public Affairs & Communications
MTAC	Customer Service -- Marketing
Contact with national and premier accounts	Business Services Network, Customer Service – Marketing

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POSTCOM/USPS-T2-17. In PostCom/USPS-T2-12, PostCom requested copies of the Postal Service's plans and procedures for ensuring that each of the sources of information that could need to be updated as a result of an AMP implementation or consolidations are actually updated on a timely basis. In response, you state simply, "Copies are not available at this time."

- a. Do such plans or procedures exist?
- b. If they do not exist, is the Postal Service in the process of developing such documents?
- c. If the documents do exist, given that no objection has been filed, when will they be provided?
- d. If the documents do exist and will not be provided in advance of the close of the record in this proceeding, please explain why not.

RESPONSE

- a. No.
- b. No. A cross-functional communications team meets on a weekly basis to discuss potential AMPs studies, ongoing studies, and potential implementation issues. The team is expected to identify necessary information updates and communicate the need for responsible administrative units to accomplish those updates.
- c. N/A
- d. N/A

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POSTCOM/USPS-T2-18. Has the Postal Service considered how the savings that may result from the AMP consolidations that are expected to be or have been implemented between FY2005 and FY2008 are likely to affect worksharing discounts? If so, what are the likely effects?

RESPONSE

I am not aware of any such analysis or whether any is contained in the current rate case.

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POSTCOM/USPS-T2-19. Current Postal Service drop entry rates for Standard Mail contemplate the existing network of dBMCs and dSCFs.

- a. How will the existing BMC and SCF destination entry rate scheme apply to the new facility types (RDCs, DPCs, etc.) as the network evolves? (For example, will the current dBMC rate apply to drop entry at destinating RDCs?)
- b. What changes to the destination entry rate scheme and rates are likely to occur as the network evolves?

RESPONSE

- a. As the network concept is clarified so that the expected approximate number of RDCs becomes known, this will determine the degree to RDCs and LPC/DPCs, respectively, take on the same destination entry roles as BMCs and SCFs, for rate and classification purposes.
- b. I am informed that the Postal Service has not yet determined to what degree or in what form or at what time classification or rate changes might be proposed in relation to upcoming network changes.

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POSTCOM/USPS-T2-20. In your response to PostCom/USPS-T2-13, you stated, "[t]he Postal Service works with mailers on a local basis to keep them informed of AMP consolidations as it deems necessary. The degree of advance notice can be expected to vary depending on the complexity of the particular consolidation and other local circumstances." With reference to this response,

- a. What criteria and tools does the Postal Service use to determine which mailers to notify?
- b. What is the Postal Service's definition of "local" in the context of an AMP consolidation?
- c. What is the nature of the information conveyed to mailers?
- d. What are the criteria used by the Postal Service in determining what information is "necessary" to convey, and which mailers it is "necessary" to notify?
- e. How does the Postal Service assess the degree of advanced notice a particular consolidation requires?
- f. What local circumstances might affect the need of mailers for advanced notice?
- g. How does the Postal Service determine the informational and advance-notice needs of mailers who are not "local"?
- h. What management function(s), position(s), or department(s) at the Postal Service is(are) responsible for communicating with mailers who are "local" in relation to AMP Consolidation?
- i. What management function(s), position(s), or department(s) at the Postal Service is(are) responsible for communicating with mailers who are not "local" in relation to AMP Consolidation?

RESPONSE

- a. Worksheet 3, Communication Documentation, from USPS Library Reference N2006-1/4, the USPS Handbook PO-408 *AMP Guidelines* provides a template for use by local managers in determining which government officials, media, community organizations and mailers to notify. See also, USPS LR-N2006-1/4 and N2006-1/12. Local managers are directed to use their knowledge of the customer base served by the facility targeted for consolidation in drawing up lists of local mailers to notify.
- b. "Local" would refer to the service area of a mail processing facility whose operations are targeted for relocation to another postal plant. Local

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RESPONSE to POSTCOM/USPS-T2-20 (continued):

- mailers would be those who (for themselves or others) enter mail in that service area.
- c. See USPS Library References N2006-1/12.
 - d. Reasonable business judgment and a focus on those customers who deal directly with the affected plant.
 - e. Headquarters representatives from Network Operations Management, Mailing Standards, the Business Service Network, Government Relations, Public Affairs and Communication, Operations Requirements and Integration, and others meet weekly and assess the degree of advance notice needed for particular consolidation.
 - f. Such factors as whether a consolidation involved closure of a facility (as in Marina CA) or changes to DMM labeling lists.
 - g. See the response to subpart (e).
 - h. The District Manager and his or her Manager of Marketing and Manager of Business Mail Entry.
 - i. As part of its AMP Communications Plan, the Postal Service is focusing on direct communication at the local level with mailers (or their agents and representatives) who have direct interaction with a Business Mail Entry Unit affected by a particular AMP. If the Postal Service deems it necessary to initiate communications with other mailers regarding AMPs in general, it will do so, either directly or in some broadcast format. There are no

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RESPONSE to POSTCOM/USPS-T2-20 (continued):

management functions, positions, or departments at the Postal Service that bear sole responsibility for communicating with mailers who are not “local” in relation to a particular AMP consolidation. Mailers who are not local to a particular consolidation are free to communicate with postal managers with whom they regularly communicate to resolve routine customer and operational issues. However, those mailers may find that those managers may not necessarily be in a position to reveal more about a particular AMP than has been made known to “local” mailers.