

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 DOUGLAS CARLSON INTERROGATORIES (DFC/USPS-12 THROUGH 14)

The United States Postal Service hereby files its responses to the following interrogatories of Douglas Carlson: DFC/USPS-12 and 13 (dated July 28, 2006); and DFC/USPS-14 (dated August 1, 2006). Each interrogatory is started verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DOUGLAS CARLSON**

DFC/USPS-12. Please refer to the response to APWU/USPS-T2-113. Please identify the extent to which changes in collection times may occur as a result of the consolidation of outgoing mail-processing operations from St. Petersburg to Tampa.

RESPONSE

Were any such changes planned, they would have been noted at

<http://www.usps.com/all/saintpetersburgtampa.htm> .

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DFC/USPS-13. Please refer to the July 24, 2006, response of witness Williams that provides changes in collection times after consolidations in Greenburg, Pennsylvania, and Olympia, Washington.

- a. Please identify the source of the data.
- b. Please identify whether the data were retrieved from backup tapes, a data warehouse, an operational data store, the production database, or somewhere else.
- c. Please identify the process by which these data were obtained, including the testing that was performed to validate the data.
- d. Please confirm that the list provides the collection times for each collection box as of the first date of each month from May 1, 2005, to July 1, 2006, even if the collection times did not change during this period.

RESPONSE

- a. The USPS Collection Point Management System (CPMS) which is hosted by the USPS Eagan MN Host Computing Service Center.
- b. CPMS consist of a production database and web user interface that allows the collection points and scheduled times to be updated.
- c. USPS Information Technology staff responsible for developing and maintaining the CPMS application have developed a process for extracting the ZIP Code, box number, and date for which the "snapshot" was taken. The Last Monday thru Friday and Last Saturday Collection Times were extracted for each box. The extract processes and data were reviewed and tested by Information Technology.
- d. Confirmed.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
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DFC/USPS-14 Please provide the current status of each AMP consolidation opportunity that witness Williams provided on July 25, 2006. In your response to a question from the OCA during cross-examination. Your response should specifically identify consolidation opportunities on the list that are no longer under consideration.

RESPONSE

As indicated previously, the Postal Service plans to examine all mail processing plants in the network for consolidation opportunities at some point in the multi-year process. Accordingly, every such facility is under consideration as a potential AMP candidate. The list of 139 potential opportunities identified last fall provided a pool from which the first wave of 41 AMP consolidation opportunities to be studied as a part of the END initiative were selected. Those 41 are identified in the list of 41 attached to USPS-T-2. The opportunity list will continue to serve as a resource, as the Postal Service identifies and schedules additional AMP study opportunities moving forward. It, no doubt, will be supplanted by a new opportunity list at some yet-to-be-determined point in the future.

With the exception of nos. 27 and 45, one should regard the opportunities from the list of 139 that did not make the USPS-T-2 list of 41 to still be under consideration. And, as reflected in USPS Library Reference N2006-1/21, the following AMP proposals from the USPS-T-2 list of 41 are not presently under consideration: nos. 11, 13, 14, 15, 16 and 31. This does not mean that these

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RESPONSE to DFC/USPS-14 (continued):

facilities are exempt or immune from all future AMP examination; it only means that the Postal Service has elected not to pursue the particular consolidation opportunities initially identified for those facilities at this time.