

**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**

**DIRECT TESTIMONY OF  
MARGARET L. YAO  
ON BEHALF OF  
THE AMERICAN POSTAL WORKERS UNION, AFL-CIO  
September 1, 2006**

**Table of Contents**

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

	<b>Page</b>
<b>I. Autobiographical Sketch.....</b>	<b>3</b>
<b>II. Purpose of Testimony.....</b>	<b>4</b>
<b>III. Why Effective Public Engagement is Essential.....</b>	<b>6</b>
<b>IV. Comparative Analysis of Current Process and Alternative Approaches.....</b>	<b>9</b>
<b>V. Recommendations.....</b>	<b>24</b>
A. Structure and Use Public Input Throughout the AMP Study Process	
B. Provide Objective, Balanced Information on Cost Savings and Service Delivery to Inform Citizen Discussion	
C. Build Credibility and Capacity by Utilizing a Far More Effective Town Hall Format and Process	
D. Build Accountability and Transparency into the Process	
<b>VI. Conclusion.....</b>	<b>33</b>
<b>Attachment</b>	

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
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21  
22  
23  
24  
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**I. Autobiographical Sketch**

My name is Margaret L. Yao. I am a senior associate of *AmericaSpeaks*, a not-for-profit organization that specializes in strengthening citizens' voice in public decision making. Since 2000, I have helped to design and deliver large, technologically enabled town meetings that have helped decision makers make budget and policy choices that are informed by citizen deliberation and prioritization. Washington DC Mayor Anthony Williams' Citizen Summits are one example.

Through *AmericaSpeaks* and my own management consulting practice I have advised government and not-for-profit clients on organizational change using strategic planning, organizational design, and cross-sector partnering tools since 1995. Between 1991 and 1995 at the U.S. Office of Management and Budget, I led management-improvement projects, whether addressing agency cost issues, performance management, or OMB's role in the National Performance Review. The latter was one of my duties as special assistant to OMB's deputy director for management. Based on my time at the OMB, I wrote about the President's Management Council, a federal management innovation that was published in *Memos to the President: Management Advice from the Nation's Top Public Administrators*, (Rowman and Littlefield Publishers, Inc.), 2001.

Prior to joining OMB, I pursued my interest in management first as a staff reporter for The Wall Street Journal and later as co-founder of an automotive drive-train innovation company.

I received a BA in Economics with distinction from the University of Michigan in 1977. While earning an MBA at the University of Texas at Austin in 1986, I was honored as a University Fellow and Sord Scholar.

I have served as an Adjunct Professor for George Washington University's Center for Excellence in Public Leadership and have taught seminars for federal managers for the U.S. Office of Personnel Management. I have not testified before the Postal Rate Commission or any Congressional committees.

1 **II. Purpose of Testimony**

2  
3 My testimony will:

4 Set forth the importance of effective public engagement and principles for  
5 achieving it

6 Provide a comparative analysis of the USPS' current public engagement  
7 strategy --as implemented at April-June, 2006, public meetings -- with  
8 alternative, more effective approaches

9 Present an alternative public input process recommendation for  
10 consideration by the Commission and the Postal Service

11 Provide final observations and conclusions.

12  
13 My testimony will show that the Postal Service has little to lose and much to  
14 gain by adopting a significantly different approach to the public input process that it  
15 has developed for its Area Mail Processing (AMP) consolidations initiated under  
16 the Evolutionary Network Development (END) strategy. My testimony also has  
17 implications for the upcoming Regional Distribution Centers (RDC) activations  
18 communications plan, which appears to lack a process to engage the general  
19 public.

20 The deficiencies of the current adversarial approach have invited scrutiny,  
21 delay, frustration, and cynicism. The Postal Service's public hearing style  
22 meetings have been a lost opportunity to deepen understanding and develop  
23 creative and sustainable ways to accomplish the Postal Service's goal of saving  
24 money through consolidations while maintaining or improving customer service.

25 My proposed pro-active citizen engagement approach will put the Postal  
26 Service in touch with its customers' needs and concerns early enough to impact  
27 decision making at the local level and promotes discussion and collaboration  
28 instead of virtually guaranteeing discord and conflict. The Postal Service can  
29 make better and more sustainable consolidation decisions by enhancing its own  
30 understanding of customer needs. Other organizations have applied such an  
31 approach to difficult and technical policy issues with great success.

1           Understanding customer needs is just good business. I believe the Postal  
2 Service can adjust its current approach to achieve better decisions in a reasonable  
3 time frame and at a level of effort that will not be overly burdensome or costly.  
4 Indeed, due to its current process, the Service is incurring real costs of  
5 cancellations and delays and may be incurring longer-term intangible costs, such  
6 as weakened public trust in the Postal Service and in the government in general.<sup>1</sup>  
7

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<sup>1</sup> Studies suggest that the performance of “front line” services bear strongly on the public’s perception of government generally. See James G. Gimpel, J. Celeste Lay and Jason E. Schuknecht, *Cultivating Democracy: Civic Environments and Political Socialization in America* (Washington, DC: Brookings Institution Press), 2003.

1 **III. Principles for Effective Public Engagement**

2  
3 Why is effective public engagement essential to the Postal Service? As a  
4 federal government-created entity, the Postal Service touches the lives of virtually  
5 every person in the United States. As a result, its policies have far-reaching  
6 effects on citizens. Effective public engagement will:

- 7  
8 Result in better informed and more durable decisions, where real and  
9 potential service delivery impacts on citizens are balanced against  
10 economic pressures; and  
11 More likely contribute to, not undermine, the public trust in the Postal  
12 Service as a government-created institution.

13  
14 The Organisation for Economic and Co-Operative Development (OECD)  
15 stated in its 2001 report on citizen engagement:

16 Engaging citizens in policy-making is a sound investment and a core  
17 element of good governance. It allows governments to tap wider  
18 sources of information, perspectives and potential solutions, and  
19 improves the quality of the decisions reached. Equally important, it  
20 contributes to building public trust in government, raising the quality  
21 of democracy and strengthening civic capacity.<sup>2</sup>

22  
23 When public engagement is done poorly, the cost is not trivial. The OECD said:

24  
25 ...[G]overnments should not underestimate the risks associated with  
26 poorly designed and inadequate measures for information,  
27 consultation and active participation. They may seek to inform,  
28 consult and encourage active participation by citizens in order **to**  
29 **enhance the quality, credibility and legitimacy** of their policy  
30 decisions, only to produce **the opposite effect** if citizens discover  
31 that their efforts to be informed, provide feedback and actively  
32 participate are ignored or have no impact at all on the decisions  
33 reached.<sup>3</sup> (emphasis added)

34  

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<sup>2</sup> *Citizens as Partners: Information, Consultation, and Public Participation in Policy-Making*, Organisation for Economic Co-Operation and Development, Paris, 2001, p. 11.

<sup>3</sup> OECD, *ibid.*, p. 21.

1           What is public engagement? The International Association for Public  
2 Participation (IAP2) Public Participation Spectrum<sup>4</sup> shows five different levels of  
3 public engagement. In increasing order of public impact, they are:

4           Inform: Provide the public with balanced and objective information to assist  
5 them in understanding the problem, alternatives, opportunities and/or  
6 solutions.

7           Consult: Obtain public feedback on analysis, alternatives, and/or decisions.

8           Engage: Work directly with the public throughout the process to ensure that  
9 public concerns and aspirations are consistently understood and  
10 considered.

11           Collaborate: Partner with the public in each aspect of the decision including  
12 the development of alternatives and the identification of the preferred  
13 solution.

14           Empower: Place final decision-making authority in the hands of citizens.

15  
16           What makes a public engagement strategy effective? My colleagues at  
17 AmericaSpeaks have laid out guiding principles for effective public engagement in  
18 their recent report, *Public Deliberation: A Manager's Guide to Citizen Engagement*,  
19 for the IBM Center for The Business of Government.<sup>5</sup> The OECD report also  
20 provides guiding principles. Based on both the OECD and the AmericaSpeaks  
21 reports, my analysis of ways to improve the Postal Service's public input process  
22 will be based on the following principles of sound public engagement design:<sup>6</sup>

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<sup>4</sup> International Association for Public Participation

<http://www.iap2.org/displaycommon.cfm?an=5>, September 1, 2006.

<sup>5</sup> Lukensmeyer, Carolyn J. and Lars Hasselblad Torres, "Public Deliberation: A Manager's Guide to Citizen Engagement," (Washington, DC: IBM Center for the Business of Government ), 2006, p. 7.

<sup>6</sup> Adapted from OECD, *ibid*, pp. 11-15, and Lukensmeyer and Torres, *ibid*, pp. 9-10.

- 1 1. Clear Purpose – Objectives for, and limits to, information that will be  
2 provided with well-defined levels of consultation, active participation, and  
3 role clarity from the outset.
- 4 2. Commitment from the Top – Ensure and communicate unwavering  
5 commitment to engage in the process and use the results in decision  
6 making.
- 7 3. Objective and Complete Information – Make accessible to citizens objective  
8 and complete information about the issues and choices involved to enable  
9 citizens to articulate informed opinions. All citizens should have equal  
10 treatment when exercising their rights of access to information and  
11 participation.
- 12 4. Neutral Framing of Issues – Offer an unbiased framing of the policy issue to  
13 allow the public to struggle with the most difficult choices facing decision  
14 makers.
- 15 5. Timing – Public consultation and active participation should be undertaken  
16 as early in the policy process as possible to allow a greater range of policy  
17 solutions to emerge. Allow for different types of information at all stages of  
18 policy cycle.
- 19 6. Tools and Resources – Select appropriate tools to fit the need and ensure  
20 that adequate financial, human, and technical resources are provided to  
21 support effective public participation, such as facilitation for high-quality  
22 discussion. Treat citizen time as a resource to be used wisely as well.
- 23 7. Diversity – Involve a demographically balanced group of citizens reflective  
24 of the impacted community.
- 25 8. Report Public Consensus – For large groups, produce information that  
26 clearly highlights the public’s shared priorities.
- 27 9. Accountability – Make sure mechanisms are in place and implemented to  
28 account for the use of citizens’ input and to ensure an open and transparent  
29 process amenable to external scrutiny and review.
- 30 10. Sustained Involvement – Support ongoing public involvement, including  
31 feedback, monitoring, and evaluation.

1 **IV. Comparative Analysis of Current Process and Alternative Approaches**

2  
3 My analysis of the effectiveness and utility of the Postal Service's current  
4 public input process relating to the AMP consolidations is confined to its five most  
5 recently held public meetings, which occurred between April, 2006, and June,  
6 2006.<sup>7</sup> My sources of information regarding the process consist of various filings in  
7 this case, particularly the Postal Service library references,<sup>8</sup> as well as the  
8 following information sources for the specific meetings:

Sioux City, Iowa (April 20, 2006)	Focus group interviews in Sioux City with selected business and community leaders, separate focus group with employees, interview of APWU local president, newspaper articles, Congressional correspondence (APWU-LR- N2006-1/5)
Rockford, Illinois (June 5)	Attendance at Rockford meeting, interviews of participants before and after the meeting, meeting transcript (APWU-LR-N2006-1/2), newspaper articles, Congressional correspondence (APWU-LR-N2006-1/5)
St. Petersburg, Florida (June 14)	Video of meeting (APWU-LR-N2006-1/3), interview of APWU local president, newspaper articles, Congressional correspondence (APWU LR-N2006-1/5)
Jackson, Tennessee (June 14)	Interview of APWU local president, newspaper articles
Yakima, Washington (June 15)	Video of meeting (APWU-LR- N2006-1/4), interview of APWU local president, newspaper articles, Congressional correspondence (APWU-LR-N2006-1/5)

9  
<sup>7</sup> It is instructive to analyze and learn from all five of these most recent public meetings, although the Postal Service in its Response to APWU/USPS-T2-100 asserted that the Sioux City and Rockford meetings were not conducted as part of the subsequently developed Public Input Process.

<sup>8</sup> These include the Area Mail Processing Guidelines, USPS Handbook PO-408 (USPS-LR-N2006-1/3), the USPS Area Mail Processing Communications Plan (USPS-LR-N2006-1/4), General Accountability Office Audit Report – GAO-005-261 (USPS-LR-N2006-1/7), Area Mailing Processing Notifications Tool Kit (USPS-LR-N2006-1/12), AMP Public Input Process Summary and Related Documents (USPS-LR-N2006-1/16), Draft 5.0 Regional Distribution Center Communications Plan (USPS-LR-N2006-1/23), Draft Regional Distribution Center Activation Planning Document (N2005-1/24).

1 My testimony is not intended as an indictment of the behavior of Postal  
2 Service officials or the public at these meetings. In fact, with few exceptions, all  
3 parties endured these sessions with decorum. The officials were doing yeoman's  
4 work: these kinds of meetings can be difficult and draining as structured. For the  
5 public, the meetings can be tedious and frustrating. The problem is that everyone  
6 is trapped in a bad process. It is painful to witness. This analysis, intended to  
7 show there is a better way, has implications for future AMP consolidations as well  
8 as proposals under the RDC activation plan.

9  
10 **A. Purpose and Timing**

11 (Principles: #1 - Clear Purpose; #2 - Commitment from the Top; #5 - Timing)

12

Current Approach	Alternative Approach
<b>One-way communication in an add-on process occurs too late to constructively influence proposal.</b>	<b>Utilize two-way, integrated approach to inform proposal development during feasibility study period.</b>

13  
14 **Current Approach:** The current public input process is an add-on process  
15 that occurs after all managers in the field have approved the proposal leaving only  
16 approval from top level headquarters outstanding. The strategy is intended to be  
17 one way. Unfortunately, the process conveys exactly that impression, creating a  
18 climate for cynicism and an adversarial response from the public.

19 The Postal Service began its AMP process devoid of public input but added  
20 on the public input sessions for all future AMPs in response to the strong  
21 concerns expressed by Sen. Tom Harkin (and others).<sup>9</sup>

22 The Postal Service inserted the new public input process after completion of

- 23 - the draft AMP feasibility study  
24 - the submitted local proposal  
25 - the area review  
26 - the Headquarters functional review.<sup>10</sup>

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<sup>9</sup> Transcript of Rockford Public Input Forum, June 5, 2006 (APWU-LR-N2006-1/2), William Galligan's opening remarks (p. 7, lines 15-19).

<sup>10</sup> USPS-LR-N2006-1/16.

1 All that is left is the final sign-off at headquarters. This late invitation of  
2 public input encourages distrust and invites cynicism about the process. “They  
3 appeared to be just getting past a public comment meeting as a step in the  
4 process, as opposed to listening,” stated a Sioux City attorney, participant in the  
5 town meeting.<sup>11</sup> Another business leader agreed: “I was convinced they had  
6 already decided what they were going to do.”<sup>12</sup>

7 In fact, the AMP Communications Plan clearly states a one-way  
8 communications objective and stresses the same in the “strategies” and  
9 “messaging” sections:<sup>13</sup>

10  
11 **OBJECTIVE: Effectively communicate to the public and our employees the**  
12 **fact that** consolidation of postal operations to make best use of plant  
13 capacity is part of the Postal Service’s **overall goal to increase efficiency**  
14 **and manage costs.** (emphasis added)  
15

16 “Messaging” is one way. There are no goals, strategies or mention of  
17 gathering service-related information from customers and citizens about their  
18 concerns or for how to use this information in decision-making.

19 Notification of the media no less than 10 days before a public meeting, as  
20 recommended in USPS AMP Public Input Process Summary and Related  
21 Documents,<sup>14</sup> resulted in a public notice buried in the Yakima newspaper.<sup>15</sup>

22 During her comments in the St. Petersburg meeting, Laurie Jones found the  
23 notice “quite lacking,” calling it “last minute.”<sup>16</sup> This type of notification, which  
24 is not unique to USPS, breeds cynicism in the process for those who know  
25 about it.

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<sup>11</sup> From focus group, June 6, 2006, Sioux City, Iowa

<sup>12</sup> *Ibid.*

<sup>13</sup> USPS-LR-N2006-1/4, p. 3

<sup>14</sup> USPS-LR-N2006-1/16

<sup>15</sup> “June 7, 2006, Around the Valley: Accident shears off part of power pole,”  
Yakima Herald-Republic, fourth item reading “Postal service offers consolidation  
meeting.”; <http://www.yakima-herald.com/page/dis/286272672912303>, June 26,  
2006.

<sup>16</sup> APWU-LR-N2006-1/3.

1 The impression of reluctant public engagement on the part of the Postal  
2 Service well may reflect its fear of resistance, as described in the GAO  
3 Report.<sup>17</sup>

4 The current process results in a go/no-go stance on the part of the public and,  
5 apparently, the Postal Service as well. To date, where public meetings have  
6 been held the Sioux City plan is on hold, subject to an audit by the Postal  
7 Service Office of Inspector of General; the Rockford plan apparently has been  
8 cancelled;<sup>18</sup> and no other AMP decision has moved forward. The entire  
9 process is subject to Congressional demands for GAO review.<sup>19</sup>

10 The RDC Communications Plan reflects a continuing bias to avoid engaging  
11 the public. Though RDC activation may result in changes in mail class  
12 service standards, the Postal Service intends only to publish information and  
13 permit written comments from the general public within 15 days of the RDC  
14 announcement. There are no plans for public meetings or any type of two-  
15 way interaction with citizens.<sup>20</sup>

16 **Alternative Approach:** An earlier engagement (Principle #5) and  
17 integration of the public with the AMP feasibility study at the local level will help  
18 inform the local proposal. Early and authentic interest in public input changes the  
19 tone, substance, and nature of the process, moving it away from an adversarial  
20 tone to a more constructive one. On the public engagement continuum, this  
21 approach moves the purpose (Principle #1) from “Inform” to “Consult” and  
22 “Engage.”

23 Initially, the public role could be to shape the actual public discourse process  
24 and then during the feasibility study period develop stakeholder data to be

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<sup>17</sup> USPS-LR-N2006-1/7, p. 58: “The Service has stated that it is reluctant to publicly disclose information on its realignment strategy because it believes that it will meet with resistance from employees, communities, and government representatives if it tells them what it is planning too far in advance.”

<sup>18</sup> APWU-LR-N2006-1/5, Letter to Congressman Donald Manzullo from William Galligan, July 31, 2006.

<sup>19</sup> APWU-LR-N2006-1/5, Letter from 19 members of Congress to David M. Walker, Comptroller General of the U.S., U.S. Government Accountability Office, May 1, 2006.

<sup>20</sup> USPS-LR-N2006-1/23

1 considered as part of the feasibility study about community priorities. For  
2 example, early on, a small group of community representatives could be  
3 engaged -- giving elected officials an option to convene, join, or observe – to  
4 inform decision makers of specific community interests and concerns to be  
5 considered, studied, or addressed. This small group also could be a  
6 sounding board to consider the feasibility of a proposal and potential options.  
7 This early public engagement could then help provide outreach, focus, and  
8 the contours of a large town meeting later in the process.

9 The large town meeting would gather useful input, as determined above, and  
10 be held at a point during the feasibility study, rather than after the fact. Thus,  
11 the input can help shape the local recommendation to headquarters,  
12 demonstrating a commitment from the top to use the information. (Principle  
13 #2)

14  
15 **B. Cost (B1) and Customer Service (B2) Information Provided to Public**  
16 (Principles: #3 – Objective and Complete Information; #4 – Neutral Framing of  
17 Issues)

18  
19 **B1: Cost Information**  
20

Current Approach	Alternative Approach
<b>Provide the public with the cost data that support messaging about cost savings due to consolidation.</b>	<b>Provide objective and complete information to the public, demonstrating a commitment to transparency, building better decisions and trust.</b>

21  
22 **Current Approach:** A clear lesson from the first five meetings is that  
23 presentation of limited, selected data undermines trust, raises questions and yields  
24 few answers.

25 Yakima -- “I don’t appreciate meetings like this without having some factual  
26 information that tells me more than what’s here,” Lynn Kittelsen, holding up  
27 the AMP summary, chided Harold Matz, the District Manager.<sup>21</sup> She echoed  
28 the comments of Rep. Doc Hastings, who wrote to USPS leadership: “I

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<sup>21</sup> APWU-LR-N2006-1/4.

1 remain troubled by the lack of detail provided by the Postal Service in  
2 providing a timeline for implementation of the Yakima consolidation study. I  
3 urge the Postal Service to seriously consider today's public comments – and  
4 respond fully to each concern voiced.”<sup>22</sup>

5 Sioux City – “The Hawkeye District Manager focused on his reasons for  
6 consolidation, failed to show facts or figures to support his position and  
7 wouldn't discuss anything else. He talked down to everybody,” said a local  
8 businessman and radio personality.<sup>23</sup>

9 Rockford – By giving data that covered only one specific quarter (a single  
10 data point), rather than trend lines, the information failed to inform and instead  
11 inflamed. Several of those in the audience were suspicious; knowing  
12 Rockford's generally superior performance to Palatine and citing weeks when  
13 mail Palatine couldn't handle was shipped to Rockford.<sup>24</sup>

14 St. Petersburg – The summary information irked several questioners at the  
15 meeting. Michael Connors, Internal Services Administrator for the City of St.  
16 Petersburg representing Mayor Baker, was interrupted by applause when he  
17 commented: “I respectfully request and feel entitled to such a meeting to  
18 review the draft results of this AMP study...(quoting the study)... A lot of  
19 detailed analysis has been conducted and we would very much like to see  
20 that analysis.”<sup>25</sup>

21 St. Petersburg – Part of the problem is that officials need better guidance on  
22 what data to provide. “As far as providing you with the data, this is your  
23 opportunity to provide input,” said Mr. Jordan. “We are not going to sit down  
24 with every organization in St. Petersburg or 337 and say, ‘okay, here's how  
25 many pennies make a nickel and how many nickels make a dime and dimes  
26 make a dollar’ and give you a chance to look at that and review it and take  
27 potshots at it -- not that you would -- but we aren't going to be doing that.

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<sup>22</sup> APWU-LR-NN2006-1/5, Letter from Rep. Doc Hastings to USPS Chief Operating Officer William P. Galligan, dated June 15, 2006.

<sup>23</sup> From focus group, June 6, 2006, Sioux City, Iowa

<sup>24</sup> From post meeting interviews with audience members, June 5, 2006.

<sup>25</sup> APWU-LR-N2006-1/3.

1 We're going to make a determination based on data and based on  
2 efficiencies," said Mr. Jordan.<sup>26</sup>

3 **Alternative Approach:** When managers provide objective and complete  
4 information with a neutral framing (Principles #2 and #4) regarding issues of  
5 specific interest to the public, this information creates informed discussion that can  
6 be fed back into the decision-making process. Community members were not  
7 seeking state secrets: they were seeking data that could help them understand the  
8 Postal Service perspective.

9 By collaborating with the public in more of a two-way process, the Postal  
10 Service boosts its potential to benefit by the political cover offered by the public  
11 input and feedback and by decisions that are better understood and supported  
12 by the public.

13 The AMP feasibility study is only part of the picture that the public is likely to  
14 consider in any specific locale. At the various meetings, in correspondence  
15 with the Postal Service, and in focus group interviews, community members  
16 have asked for:<sup>27</sup>

- 17 ○ Local performance trend data of all affected and neighboring operations
- 18 ○ For prior AMP consolidations, how savings and services aligned with  
19 predictions and any lessons learned
- 20 ○ Data that could serve as indicators of expected performance, e.g.,  
21 Saturday service that has been previously shipped to the acquiring facility  
22 from the target facility
- 23 ○ Economic impact of contemplated changes in the affected community and  
24 approaches for mitigating or addressing these impacts
- 25 ○ Options under consideration and reasons why any options were dropped.

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<sup>26</sup> *Ibid.*

<sup>27</sup> Transcript Rockford Meeting, APWU-LR-N2006-1/2; Video of St. Petersburg, APWU-LR-N2006-1/3; Video of Yakima, APWU-LR-N2006-1/4; Letter from Rep. C.W. Bill Young to John E. Potter, Postmaster General, USPS, June 19, 2006, APWU-LR-N2006-1/5 Letter from 19 Congressional members to David M. Walker, Comptroller General of the U.S., APWU-LR-N2006-1/5; Sioux City focus group responses, June 6, 2006.

1 The process of adopting such an approach to developing and sharing data  
 2 with citizens may require a rethinking of attitudes toward public engagement.  
 3 This has been undertaken successfully by other organizations. For example,  
 4 one federal regulatory agency manager recalls the “long night” where her  
 5 agency’s only handout was a notice from the Federal Register, which  
 6 frustrated the citizens who sought more and better information. She recalled  
 7 at a recent conference how her group went through a growth process  
 8 because she knew they “could do better and that [her agency] had a better  
 9 message to deliver. Arrogance, with the best of intentions, doesn’t get you  
 10 very far,” she concluded.<sup>28</sup>

11  
 12 **B2. Customer Service Information**  
 13

<b>Current Approach</b>	<b>Alternative Approach</b>
<b>Customer service data are not provided.</b>	<b>Fully disclose and discuss local customer service data and standards – demonstrating transparency and discuss options for balancing costs and service.</b>

14  
 15 **Current Approach:** Many service organizations routinely collect market  
 16 information about their customer service. The absence of customer service  
 17 information at the Postal Service meetings deserves special mention, since  
 18 customer service is predictably the main concern at the meetings. There are four  
 19 problems here: (1) the promise of no degradation in overall service entails the  
 20 possibility of some degradation in some service commitments,<sup>29</sup> but this fact is not

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<sup>28</sup> This experience was shared at the Wye Center Conference, June 20-21, 2006, Champions of Public Participation, sponsored by the Deliberative Democracy Consortium. For purposes of confidentiality, quotes from federal employees participating in the knowledge-building network are included without attribution.

<sup>29</sup> USPS-LR-N2006-1/3, AMP Guidelines, Worksheet 7a:  
 In certain consolidations, it may not be feasible to protect all of the overnight or two-day service commitments for the consolidated office. The general rule is that consolidating two or more offices should not result in any degradation of service; however, there will be instances where it is not economically wise to maintain commitments involving a small amount of

1 communicated to the public; (2) no data or methodology for determining and  
2 evaluating degradation are shared with the public; (3) there appears to be no  
3 methodology for collecting, analyzing and predicting the impact of service changes  
4 on segments of customers impacted in the AMP feasibility study locale; and (4) this  
5 information is not solicited.

6 St. Petersburg – Data simply need to be shared. “Hardly reassuring” was  
7 how Rep. C.W. Bill Young described his reaction to mere assertions by the  
8 Postal Service that services would be unaffected.<sup>30</sup> Connors, a city official,  
9 requested, among other things, both cost-effectiveness data as well as “a  
10 clear and concise study demonstrating no relaxation of current mail delivery  
11 service.”<sup>31</sup> Connors was seeking a way to analyze objective data regarding  
12 any tradeoffs between cost and service (Principles #2 and #4).

13 Rockford and Sioux City – The absence of data, or explanations to the  
14 contrary, was glaring in light of the testimony of witnesses about Saturday  
15 service degradation in both communities. In Rockford, witnesses told of  
16 personal experience with degradation from 1-2 day service to 5-7 days, or  
17 longer, due to the consolidation of Saturday delivery at the gaining facility  
18 where further consolidation is proposed. This was seen as a leading indicator  
19 in both locations and a stunningly poor showing at that.

20 Rockford and Sioux City – The impact on the economics of the community  
21 were cited in both locations, but currently there is no methodology in the AMP  
22 process to accurately measure or predict impacts. Among the concerns  
23 highlighted were:

- 24 ○ Timeliness of delivery of financial and legal statements and filings  
25 important to institutions, citizens, and judicial system

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mail. In order for any trade-off between service commitments to be approved, it must be clearly established that the overall service/cost relationship for the combined service area improves.

<sup>30</sup> APWU-LR-N2006-1/5, Letter from Rep. C.W. Bill Young to John E. Potter, Postmaster General, USPS, June 19, 2006.

<sup>31</sup> APWU-LR-N2006-1/3

- 1           ○ Timeliness of the delivery of invoices, accounts receivables, and other
- 2           billing-related issues affecting small businesses, their customers, and
- 3           customer relations
- 4           ○ Loss of one-day delivery of newspapers
- 5           ○ Community identity, related to postmarks
- 6           ○ Area employment

7           Rockford and Sioux City – Though potential degradation of service may be  
8           small in volume, the equity impact was of large concern. For example, those  
9           who can least afford them may end up paying late fees and interest on late  
10          bills or receiving medications late. “My biggest concern, if this consolidation  
11          goes through, is that we will be leaving behind the elderly, the poor, the most  
12          vulnerable, who every single day would experience the degradation of  
13          service,” the director of a community health center said in Sioux City. “I am  
14          outraged at the contemptuous way the Post Office treats those people, the  
15          ones who keep the postal service in business and have no other way to pay  
16          their bills,” he added.<sup>32</sup>

17          **Alternative Approach:** As noted earlier, citizens could work with the Postal  
18          Service to identify which types of data, standards, performance targets, and  
19          assumptions are relevant and useful. The key data will be those that help explain  
20          predictions of service-neutral changes and potential tradeoffs between cost and  
21          customer service that might be undertaken. Citizens have expressed a willingness  
22          to participate in baseline and evaluative test mailing collection and studies.<sup>33</sup>

23          Local stakeholders may prove useful as resources for looking at the broader  
24          economic impact of the AMP effort on given communities.

25          The idea of weighing options and trade-offs in a public forum is becoming  
26          more commonplace in the U.S., Canada, and in other democracies around

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<sup>32</sup> From focus group, June 6, 2006, Sioux City, Iowa.

<sup>33</sup> *Ibid.*

1 the world, where background information helps inform discussions fraught  
2 with political tension.<sup>34</sup>

3 As the AMP consolidations progress, there should be customer service and  
4 cost savings data from those underway that could be used to help build  
5 credibility for success in the past or as grist to encourage joint problem  
6 solving.

7

8 **C. Format for Engaging the Public**

9 (Principles: #2 – Commitment from the Top; #4 – Neutral Framing of Issues; #5 –  
10 Timing; #6 – Tools and Resources; #7 – Diversity; #8 – Public Consensus)

11

<b>Current Approach</b>	<b>Alternative Approach</b>
<b>Hold traditional public hearing-style meetings, where it is unclear who is in the room and where few speak and most listen.</b>	<b>Apply a two-phased approach that taps citizens as a resource to identify information and issues that then become the focus of a larger demographically diverse town hall.</b>

12

13 **Current Approach:** The traditional public hearing format can be extremely  
14 frustrating for both the public and USPS officials, particularly when the public  
15 turnout is large. The larger the meeting, the fewer the people that are heard and  
16 the harder it is to manage the process. The process does not lend itself well to  
17 dialogue about critical, hot-button issues, resulting in unsatisfactory exchanges. In  
18 the end, the inability of attendees to have a meaningful, data-driven dialogue was a  
19 source of frustration.

20 Rockford – Management appeared unprepared in the face of the parade of 12  
21 witnesses, who were compelling in the detail, consistency, and sheer  
22 repetition in sharing personal experiences of significant and consistent delays  
23 in service to 5-7 days from 1-2 days due to a prior consolidation of Rockford's  
24 Saturday mail at Palatine, the proposed gaining facility.<sup>35</sup>

25 St. Petersburg – After three people had suggested moving some of Tampa's  
26 operations to St. Petersburg, the opposite of the proposed approach, District

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<sup>34</sup>For example, various recent health care policy-related forums in the U.S. and Britain, as well as an upcoming Canadian health-care forum, are typical examples of data-driven deliberations.

<sup>35</sup> APWU-LR-N2006-1/2 and APWU-LR-N2006-1/1.

1 Manager Michael Jordan expressed exasperation: “There is no capacity to  
2 put that equipment in the St. Pete’s plant. It could not happen. So, just to  
3 take that emotional claim off the floor, it is not feasible. We know that. We  
4 know the Postal business. Trust that we are trying to do the right thing in  
5 making this decision. You need to trust that,” he said, but the response was  
6 an audible murmuring and questioning, hardly indicating trust.<sup>36</sup>

7 Yakima – October Gross, an antiques dealer, questioned the consolidation  
8 cost savings in light of her broken collectibles due to her experience of poor  
9 current Postal Service handling, making for a palpably awkward confrontation.  
10 “My issue is that I am a customer and you’re saying you haven’t heard  
11 through the channels that it’s been costing the customers enough. Or, it  
12 hasn’t been enough of a complaint. I am up here telling you that it has cost  
13 me at least a quarter or more of your (proposed consolidation) savings in my  
14 collectibles that I have not been able to collect through insurance or  
15 otherwise,” she said.<sup>37</sup>

16 St. Petersburg – People have little choice but to vent. Barbara McCormick  
17 Heck, Vice President of the Council of Neighborhood Associations, South  
18 Pinellas County, asked for the data and the opportunity to discuss it.<sup>38</sup> “We  
19 have not been supplied with enough information at this meeting to go into the  
20 detail we would like to talk about the issues,” said another witness.<sup>39</sup>

21 **Alternative Approach:** A different way of engaging the public is, early on,  
22 to tap citizens as a resource (Principles #5, 6) to help shape a large deliberative  
23 forum where relevant data are neutrally presented for discussion and consensus-  
24 building (Principles #5, 6, 8). The primary difference from the current approach lies  
25 in recognition of the interest, stake, and wisdom of citizens as customers.  
26 Everyone benefits when different interests struggle with the same cost-service  
27 tradeoffs, or other policy tensions, together with full information.

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<sup>36</sup> APWU-LR-N2006-1/3.

<sup>37</sup> APWU-LR-N2006-1/4.

<sup>38</sup> APWU-LR-N2006-1/3.

<sup>39</sup> *Ibid.*

1 Different information requirements over the cycle of decision making require  
2 different approaches. Initially, customer interest and concerns could be  
3 gathered via focus group interviews, citizen surveys, formal advisory groups,  
4 such as the Postal Customer Council, or other types of groups convened or  
5 led by Congressional representatives or other community leaders. This  
6 information could inform planning for a wider town meeting or other public  
7 input model, where local community leaders may act as resources to  
8 determine where trade-offs and concerns could be discussed, perspectives  
9 polled, and discussions themed. A citizen advisory group also may assist in  
10 planning outreach to seek a demographic representation of the community  
11 interests potentially impacted by the contemplated AMP initiative. (Principle  
12 #7)

13 A town meeting or town hall format could be structured to give each  
14 participant a voice at a table discussion, where technology enables collection  
15 of themes from that and other tables to be fed back for all to see and vote on.  
16 With polling technology, it is possible to know who is represented in the  
17 room.<sup>40</sup>

18 The readiness and interest of leaders and citizens in getting involved outside  
19 of a public hearing situation has been expressed and demonstrated. In St.  
20 Petersburg, Barbara McCormick Heck, who represents associations in the  
21 area, lamented the lack of information and volunteered at the public meeting  
22 to work with the Postal Service in an ongoing fashion.<sup>41</sup> In Sioux City, people  
23 have volunteered to help out in studies and have traveled to Washington to  
24 address issues of obvious concern to them. One Sioux City focus group  
25 participant, an attorney, expressed a willingness to take the time to analyze  
26 the feasibility analysis and have a meeting to discuss the best ways to  
27 achieve service and meet needs.<sup>42</sup> Another community leader said in the  
28 focus group he would be willing to brainstorm with the Postal Service about a

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<sup>40</sup> To learn more about how this technology-enabled format works, see [www.americaspeaks.org](http://www.americaspeaks.org).

<sup>41</sup> APWU-LR-N2006-1/3

<sup>42</sup> From focus group, June 6, 2006, Sioux City, Iowa.

1 community-wide education campaign “if we do end up needing to delay  
2 mail.”<sup>43</sup> Both indicated a willingness to problem solve with the Postal Service.

3 **D. Accountability**

4 (Principles: #2 – Commitment from the Top; #6 - Tools and Resources; #9 –  
5 Accountability; #10 – Sustained Involvement)  
6

Current Approach	Alternative Approach
<b>Accountability to the public is missing and unclear. Follow-up communications are not in place.</b>	<b>Build accountability and transparency into the process, particularly regarding customer service.</b>

7  
8 **Current approach:** Except for communicating approvals, there are no  
9 plans or promises for communication back to the general public about any of the  
10 next steps. Post-Implementation Review (PIR) results do not specifically include  
11 customer service standards, means for considering customer complaints, and a  
12 feedback mechanism to customers on performance.<sup>44</sup> In addition, very few PIRs  
13 actually have been conducted.<sup>45</sup>

14 Rockford – The lack of coordinated communication concerning the Rockford  
15 proposal after the public meeting is illustrative. The official from Postal  
16 Service headquarters twice told the June 5 meeting attendees that the  
17 Rockford AMP was “on hold,”<sup>46</sup> but in responses to interrogatories in this  
18 case, the Postal Service denied the official said it was “on hold.”<sup>47</sup>  
19 Congressman Don Manzullo’s office announced on July 31 that the Postal  
20 Service was not moving the Rockford processing to Palatine, based on a

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<sup>43</sup> *Ibid.*

<sup>44</sup> USPS-LR-N2006-1/3, AMP Guidelines.

<sup>45</sup> USPS-LR-N2006-1/8, OIG Audit Report, December, 2005, p. 6:

PIR documentation was available for only 5 of the 28 implemented AMPs since 1995. Of those five, only three included both an interim and full-year PIR.

<sup>46</sup> APWU-LR-N2006-1/2, p. 6, line 20, p. 61, line 17.

<sup>47</sup> In response to APWU/USPS-T2-101 (July 7, 2006), USPS Witness Williams stated that “[Mr. Galligan’s] commitment was that progress toward completion of the study would continue, with the expectation that a proposal would ultimately be submitted to him for decision” and denied that the Rockford AMP had been placed on hold.

1 letter he received from the Postal Service<sup>48</sup> but there has been no Postal  
2 Service press release or public statement on the issue.  
3 St. Petersburg – External review also was requested. Connors, a city official,  
4 made a point of requesting a GAO review of the USPS studies.<sup>49</sup>  
5 Only conclusions from the feasibility study were shared with the general  
6 public. Therefore, any details from the semi-annual and annual post-  
7 implementation reviews that compare estimated savings with actual results  
8 also would not be made public.<sup>50</sup>

9 **Alternative Approach:** Accountability mechanisms regarding performance  
10 measurement and feedback to customers as well as other communications  
11 demonstrate commitment to a transparent process (Principles #2, 6, 9, 10).  
12 Standards of performance for customer service can be set, measured, and actual  
13 performance communicated as part of the feasibility study as well as the post-  
14 implementation reviews (PIRs). There are numerous communications steps that  
15 can be taken, such as:

- 16 ○ Provide reports via email, or first-class mail, soon after the forum
- 17 ○ Provide regular updates on USPS website
- 18 ○ Provide information about the status of the proposal and how information  
19 from the public meeting was considered in returning a final decision,  
20 whatever that may be
- 21 ○ Share a timetable of expected next steps; if timing of a decision is unclear,  
22 be transparent and promise status updates.

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<sup>48</sup> APWU-LR-N2006-1/5, Letter to Congressman Donald Manzullo from William Galligan, July 31, 2006.

<sup>49</sup> USPS-LR-N2006-1/3.

<sup>50</sup> USPS Response to APWU/USPS-T2-102 (July 7, 2006) indicated that the only way this information would be made public would be through a FOIA request.

1 **V. Recommendations**

2  
3 The AMP consolidation reviews began as a process that had no input from  
4 the public. The public input process was created only after elected representatives  
5 in Congress became involved. To date, every time there has been a public  
6 meeting, strong opposition to the AMP decision process has been expressed.

7 The AMP Plans are garnering public interest. This should be viewed as an  
8 opportunity rather than an obstacle. The key is harnessing that interest and using it  
9 productively and constructively. Thus, a dramatically different approach is  
10 recommended here, each with Action Steps. The attachment to this testimony is  
11 provided for illustrative purposes. It is a high-level project plan to show how the  
12 recommendation could be translated into phased action.

13 **A. Structure and Use Public Input Throughout the AMP Study Process –**

14 The public input process can and must be interwoven with, rather than standing  
15 separately from, the six-month feasibility study period for the AMP consolidations.  
16 USPS should seek public input early as an integral part of the AMP feasibility  
17 study, first engaging community leaders to inform and shape the solicitation of  
18 broader public interest in the AMP effort and then analyzing and incorporating this  
19 input as part of the AMP study and proposal from the local level.

20 This is not an attempt to co-opt opposition but rather to engage parties who  
21 will get involved anyway, sooner or later, in order to build shared  
22 understanding of impacts, issues, and options.

23 Rather than playing out the issues in the media, this inclusive process creates  
24 a space for constructive development of a plan, taking into consideration  
25 perspectives beyond those of internal management.

26  
27 **Action Steps:**

- 28  
29 1. (Pre-Planning) Redefine objectives for public engagement to reflect two-  
30 way communication, and to foster understanding and prioritize how  
31 customer service impacts are considered and addressed while efficiency  
32 is improved.

- 1           2. (Pre-Planning) National office assigns a public engagement specialist to  
2           advise area management on putting together the public engagement  
3           timeline.
- 4           3. (Pre-Planning) Area management pro-actively reaches out to elected  
5           officials – from Congressional to mayor and council – to identify the role  
6           they wish to play in public engagement. Such a role might be convening  
7           (as Manzullo and Harkin did in Rockford and Sioux City, respectively),  
8           advisory, or oversight.
- 9           4. (Pre-Planning) Area management coordinates with the political officials on  
10          the announcement of the creation of a Citizen Advisory Panel (CAP), or  
11          the intent to create it, as part of the AMP study. Announcement also  
12          invites early input to the CAP leader(s). Ideally consisting of six to eight  
13          persons, the CAP will reflect the demographics of the impacted citizenry,  
14          serving as a citizen proxy in the early stages. Thus, the CAP may include  
15          a representative from the Postal Customer Council to represent business  
16          mailers but would not be the PCC.
- 17          5. (Month 1) Area management, with support of political officials, convenes  
18          the CAP. With the assistance of a public engagement expert, the Postal  
19          Service scopes out the CAP’s work and how it will evolve over the six  
20          months.
- 21          6. A sample scope of work for the CAP might look like:
  - 22               a. (Month 1) Inform decision-makers of specific community interests  
23               and concerns, identifying critical information to be developed or  
24               shared.
  - 25               b. (Month 2-4) Act as sounding board to develop or react to feasibility of  
26               proposal and potential options.
  - 27               c. (Month 2-4) Spearhead outreach to community for a useful and  
28               productive larger town meeting and assist in developing the brief  
29               discussion guide (consisting, for example, of data, options, and  
30               decision criteria) to structure the town meeting deliberations.
  - 31               d. (Month 4) Support the town meeting process.

- e. (Month 4-6) Provide advice to Postal Service on final local recommendations being developed and plans for public accountability.
- f. (Post-study) Participate in quarterly progress review first year and semi-annual second year.

**B. Provide Objective, Balanced Information on Cost Savings and Service Delivery to Inform Citizen Discussion** – Incorporating advice of the CAP and public engagement experts, the Postal Service identifies the necessary information to develop and share publicly at the town meeting. The focus should be to deepen understanding of the impacts of AMP options under consideration and to demonstrate transparency. In the absence of useful data, opinions and emotions will fill the vacuum. The data legitimately worthy of development and sharing could include:

Targets and performance trends and forecasts for affected operations, presumably as a basis for projected cost savings and service delivery impacts.

Predicted business and economic impacts on local community of consolidation options.

Predicted impacts of consolidation options on certain customer constituencies and means for mitigating potential adverse impacts (e.g., geographic – rural; residents – elderly; small business – eBay sellers; large mailers – newspapers, etc.).

Leading indicators, trends, and explanation of potential service levels in the local area or from other AMP consolidations (e.g., Saturday service that had been previously transferred to the gaining facility from the transferring facility).

**Action Steps:**

- 1. (Months 1-3) Create a baseline for service delivery in the local area. Postal Service, in association with CAP or other community groups,

1 conducts service-delivery test mailings of various types of mail. This would  
2 allow exact measurement of time from various mailing points (collection  
3 boxes, postal stations, etc) to home or business delivery, with tracking  
4 through postal operations. This type of study also could be undertaken  
5 independently by APWU and/or community groups.

6 2. (Months 1-3) Work with public engagement and communication experts  
7 and CAP to understand additional data that are most important and relevant  
8 to develop and make meaning of the data for this process. Develop the  
9 data as appropriate.

10 3. (Months 2-4) Ascertain with public engagement specialist and CAP the  
11 topics of highest importance to local community that will be discussed at the  
12 town meeting. Consider other means of testing discussion topics. Create  
13 discussion guide, including the balanced, objective data to inform citizens'  
14 discussions.

15 4. (Ongoing) Conduct regular additional service-delivery test mailings to  
16 compare against baseline results. These quarterly tests, occurring through  
17 the end of the post-implementation review period, will provide data  
18 necessary to ascertain actions needed, if any, to ensure overall service-  
19 neutrality of the AMP or RDC consolidation. These may be conducted by  
20 the Postal Service or other entities as long as the methodology remains  
21 consistent.

22

23 **C. Build Credibility And Capacity By Utilizing A Far More Effective Town**

24 **Hall Format and Process** – With a potential of 140 AMP town meetings, plus  
25 potentially 100 additional RDC-related town meetings, it behooves the USPS to  
26 learn how to constructively and productively engage the public to achieve better  
27 informed, more sustainable, cost effective, and timely decisions. The Postal  
28 Service will gain valuable experience and insights about how to engage the public  
29 regarding consolidations. The Postal Service should evaluate the process after the  
30 first several AMP Town Meetings. This learning process will build the Postal  
31 Service's internal capacity to organize and host more effective future AMP and

1 RDC town meetings. Such capacity-building requires commitment at the top levels  
2 of management to invest in the process, learn from it and then to fully integrate and  
3 use the learnings.

4 A variety of large deliberative forum models exist and, as long as they  
5 adhere to the guiding principles, any of the models could work. I am most familiar  
6 with the *AmericaSpeaks 21<sup>st</sup> Century Town Meeting*<sup>51</sup>, so I will reference this  
7 model in my recommendations as an example. This model was developed to  
8 discuss Social Security around the country over 10 years ago and has now been  
9 applied across the U.S. and globally. This model is well suited to the purposes  
10 outlined here, replacing a hearing-style meeting with a neutrally convened  
11 deliberation and discussion format. Thus, instead of individual concerns aired  
12 anecdotally by a small number of participants, this town meeting format allows all  
13 citizens to discuss the implications of the issues at hand, using objective  
14 information, where the discussion leads to identifying shared priorities.

15 Diverse groups of citizens/stakeholders participate in round-table discussions  
16 (10-12 people per table), supported by a trained facilitator that keeps citizens  
17 on task and equitably participating. Detailed, balanced background  
18 information guides discussion and increases the knowledge of the issues  
19 under consideration.

20 The town hall would be supported by one or two kinds of technology. The  
21 first is a groupware computer system: each table group captures its  
22 prioritized comments on a networked laptop. All the tables' comments are  
23 forwarded to a "theme team" that reports and displays major themes shortly  
24 afterward to the whole room. The second technology is wireless keypad  
25 polling that allows individual voting on questions and options on a handheld  
26 device. These results are immediately displayed to the whole room. When  
27 combined, the entire group responds to the strongest themes generated from  
28 table discussions and can vote on final recommendations to decision makers.  
29 Before the meeting ends, a report of the results from the meeting may be  
30 distributed to participants, decision makers and the media as they leave.

---

<sup>51</sup> AmericaSpeaks website: [www.americaspeaks.org](http://www.americaspeaks.org)

1 Decision-makers host the meeting, observe the process, comment on citizen  
2 inputs and next steps at the meeting's end, and use the results in decision  
3 making afterwards.

4 This approach is customized to meet specific needs, whether for large or  
5 small groups, ongoing purposes, or for politically charged issues. A  
6 combination of small and large meetings has been used in Northeastern Ohio  
7 regional planning as well as in U.S. health care policy discussions. The  
8 process has become a regular means by which Washington, DC citizens  
9 engage in biennial budget prioritization at the Mayor's Citizen Summits over  
10 the last eight years. In 2001, six counties in the metropolitan Chicago region  
11 developed shared priorities for land use planning and transportation issues.  
12 In 2002, the format proved effective and useful in citizens' discussion of the  
13 redevelopment of the World Trade Center site in New York, despite the  
14 inherently difficult political and emotional issues.<sup>52</sup> In 2005, world leaders  
15 applied the process to prioritize action on the top six global challenges at the  
16 World Economic Forum's annual meeting in Davos, Switzerland. In all cases,  
17 the deliberative format for engagement has resulted in consensus-driven  
18 priorities that were then used by sponsors of the town meetings in future  
19 decision making.

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<sup>52</sup>The July, 2002, discussions concerning redevelopment of the World Trade Center, known as the Listening to the City town meeting, where 4,500 gathered at the Javits Center, was hailed by many decision makers, the media, architects and planning leaders as "a model for the future" for demonstrating that it was possible for thousands of citizens to come together, deliberate difficult issues, and reach consensus within a highly charged and complex decision-making process. For example, New Yorker architecture critic Paul Goldberger said: "Listening to the City would ultimately come to have a powerful, even profound, effect on the Ground Zero planning process, if not on the entire direction of American urban planning itself," in his 2004 book *Up from Zero: Politics, Architecture, and the Rebuilding of New York* (New York: Random House), p. 69.

1 **Action Steps:**

- 2
- 3 1. (Throughout) Senior management must communicate recognition of the
- 4 interest, knowledge, stake, and wisdom of citizens and customers in
- 5 contributing to the AMP process through a pro-active public engagement
- 6 process. This represents an altered set of principles and assumptions
- 7 underlying the process.
- 8 2. (Pre-planning) Identify and put into place the resources necessary to
- 9 support this shift in approach. Such a shift could entail any or all of the
- 10 following:
- 11 a. Create a public engagement office, led by a senior-level, public-
- 12 engagement specialist, to serve as a central coordinator, repository of
- 13 learning, and adviser on public engagement to the rest of the
- 14 organization, especially the field, and bringing in other technical
- 15 assistance as needed.
- 16 b. Create a cross-departmental AMP Communications Group to include
- 17 field staff that can help inform the process going forward.
- 18 c. Arrange for senior leadership and staff to attend a town meeting to
- 19 experience first hand, “behind the scenes,” the public engagement
- 20 model contemplated.
- 21 3. (Pre-planning) Engage a public-participation specialist to assist with design
- 22 and facilitation of the two-phase CAP and Town Meeting processes.
- 23 4. (Pre-Planning) Determine best approaches with the specialist for neutrally
- 24 convening Postal Service town meetings. Some venues may require
- 25 modified town meetings, depending on the level of interest and complexity
- 26 of issues in a given location.
- 27 5. (During and after first several town meetings) Record town meetings and
- 28 develop a short training video of the process.
- 29 6. (After each of the first several town meetings) Debrief and evaluate
- 30 effectiveness and patterns to standardize processes to extent possible,
- 31 such as:
- 32 Sets of customer-service data to share with CAP at first meeting

- 1 Timelines for CAP and Town Meetings.
- 2 Town Meeting outreach mechanisms, agenda, report template.
- 3 Process steps for analyzing town meeting results.
- 4 Accountability process and communication mechanisms.

5  
6 **D. Build Accountability and Transparency into the Process** – The Postal  
7 Service should develop criteria for evaluation of the AMP consolidation’s success  
8 in saving money and maintaining or improving overall service. It should develop  
9 data to support such an evaluation. Finally, the Postal Service should  
10 communicate with the public about that performance as well as the process of  
11 evaluation. All of this will help build openness and accountability, supported by  
12 sustained citizen involvement. Such an effort will go far to maintain and build  
13 public trust in the Postal Service.

14 The Postal Service is not obligated to use and account for every piece of  
15 customer input, but it is appropriate for the Postal Service to describe its  
16 process, timeline, and how the major priorities identified at the town meeting  
17 contributed to final decisions.

18 Standards of performance on service delivery should be built into and  
19 communicated with any consolidation decisions. For credibility, reporting  
20 intervals should be determined with CAP input and are likely to be more  
21 frequent than stated in the PIR, e.g., quarterly instead of semi-annually.

22 Regular reporting on the performance and means for evaluating and improving  
23 performance are critical to a successful, trustworthy process.

24  
25 **Action Steps:**

- 26
- 27 1. (Pre-planning through first few town meetings) Develop with CAP
- 28 accountability and feedback mechanisms deemed appropriate by citizens
- 29 engaged in the process.
- 30 2. (Pre-planning through early town meetings) Build in and communicate
- 31 standards of performance for customer service expected as a result of any

- 1 decision to consolidate and plan to report on these at intervals to which the  
2 CAPs will agree.
- 3 3. (At town meetings) Provide take-home report for participants on themes  
4 from the meeting.
- 5 4. (Pre-planning and throughout) Create and update a readily accessible,  
6 highly visible website page that is current, accurate, and transparent about  
7 the process.
- 8 5. (Pre-planning through early town meetings) Build in learning and culture  
9 change about citizen engagement.
- 10 6. (Pre-planning throughout early town meetings) Plan for how citizen input will  
11 be considered and used during the six-month feasibility study period.
- 12 a. Develop a methodology for soliciting input, analyzing and predicting the  
13 impact of service changes on the customers.
- 14 b. Reflect these changes in a revised format for recording customer  
15 feedback: Customer input reasonably could be recorded against  
16 standards – e.g., speed, consistency – and the impact mapped for  
17 various stakeholder groups.
- 18

1 **VI. Conclusion**

2  
3 The Postal Service faces a challenge and an opportunity in the way it  
4 chooses to conduct public engagement as part of its AMP consolidations and  
5 upcoming RDC activations. Here is an illustration of those options:

6 **Option A:** Respond to unhappy legislators by holding a public input session at  
7 the end of a closed feasibility study. Endure a public venting and overwhelming  
8 opposition by a largely uninformed public in response to a presentation of  
9 limited facts supporting the consolidation proposal. In all likelihood, delay  
10 implementation of the proposal as the short-term result and potentially ignore  
11 important considerations that may have unintended consequences.

12 **Option B:** Seek and achieve a better quality decision by providing, and  
13 receiving, useful information from the impacted community as part of the  
14 analytic study process, not after it. Engage stakeholders and citizens in  
15 phased, structured ways to help inform a thoughtful analysis to develop options  
16 and recommendations. Exchange public opposition for constructive public  
17 inclusion.

18 The public meetings conducted thus far have been much closer to Option A  
19 than to Option B. The Postal Service public input strategy is needlessly flawed and  
20 can be repaired. It generates adverse public reaction and, in fact, leaves little  
21 choice but to respond negatively. It severely limits the value and use of any  
22 information provided by the public. It is painful to witness and, in the end, is likely  
23 to decrease public trust in the Postal Service should the proposed consolidation go  
24 forward.

25 There is a better way. I have proposed a version of Option B, a pro-active  
26 approach, structured to garner information to help leadership make better quality  
27 decisions. When embraced by leadership, appropriately designed stakeholder and  
28 citizen engagement creates opportunities for sharing of quantitative and qualitative  
29 data to inform the development of options and public decision making.

30 Option B has been recognized, and is increasingly used by organizations  
31 across the country. Despite some leaders' initial concerns that the public may not  
32 be sophisticated enough to understand technical information or nuanced policy

1 questions, leaders have found this approach helpful and enlightening. In fact, for  
2 controversial decisions, such as environmental impact studies, the direction of  
3 scientific research, health care policy, or facility closings, leaders are discovering  
4 that strategies to truly engage the public become even more important, not less.<sup>53</sup>

5 The proposed citizen engagement process requires an up-front investment  
6 and sustained commitment by Postal Service leadership, but it is not difficult to  
7 implement if the step-by-step changes to the existing process and practice are  
8 applied and it can be done within the existing AMP timeline. Indeed, the cost of  
9 delays, cancellations, and diminution of public trust in the Postal Service may be  
10 far more costly than the investment required.

11 It behooves organizations responsible to the general public, like the Postal  
12 Service, to be thoughtful and creative about engaging the public as stakeholders,  
13 customers, and/or partners. A strategy where all parties benefit by expanding  
14 consideration of the variety of economic, political, and societal interests to be  
15 considered is more likely to build understanding and goodwill toward the Postal  
16 Service and lead to better decisions.

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<sup>53</sup> For example, when the U.S. Army had 30 tons of weapons to destroy, it invested in creating a Citizens Advisory Technical Team that became highly knowledgeable and, in the end, was inclined to support and bring credibility to the Army's process in this contentious area. At Lake Tahoe, several land and environmental agencies were brought together to work through differing agendas to create a shared, community-driven plan to help restore Tahoe's "blueness." Wye Center Conference, June 20-21, 2006, Champions of Public Participation, sponsored by the Deliberative Democracy Consortium.

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**PROJECT MANAGEMENT TABLE: ILLUSTRATIVE PUBLIC ENGAGEMENT PROCESS**

This table illustrates how a new public engagement process could be integrated with the AMP feasibility study so as to occur within the 26-week AMP study timetable. The table shows how the recommended public-engagement process could be translated into action steps. If used as a template, it could be modified to show action sub-steps, specific names of responsible parties, specific start and end dates, and other information upon project approval.

Action Step	Lead Others	Start Date	End Date	Information to Whom
<b>A. SET STAGE FOR PUBLIC ENGAGEMENT PROCESS</b>				
1. Coordinate budget, <b>Public Engagement Specialist (PES)</b> , announcement planning	USPS	Advance	In Advance	
2. Prepare customer-service baseline data	USPS	In Advance	Week 4	For use by CAP
3. Establish database of interested citizens and follow-up for two-way communication with public	USPS, with PES	In Advance	Week 0	USPS - for CAP creation, town meeting outreach
4. Reach out to political officials and community leaders to coordinate public engagement process and potential <b>Citizen Advisory Panel (CAP)</b> membership	USPS, with PES	In Advance	Week 0	
3. Announce AMP Feasibility Study	USPS	Week 0	Week 0	To public
4. Establish CAP	USPS, with PES	Week 0	Week 4	
<b>B. PERFORM OUTREACH</b>				

<b>Action Step</b>	<b>Lead Others</b>	<b>Start Date</b>	<b>End Date</b>	<b>Information to Whom</b>
1. Identify critical stakeholder groups and key contacts	CAP, with USPS, PES	Week 4	Week 6	For USPS outreach
2. Invite registration of critical stakeholder group participants to Town Meeting (PSAs, media announcements, wide variety)	USPS	Week 6	Week 10	To public, Register on database
3. Follow up invitations (phone calls, additional media contacts etc)	USPS, with CAP	Week 10	Week 12	Register on database
<b>C. PREPARE DISCUSSION GUIDE</b>				
1. Identify critical data, issues, options etc. to include in discussion guide	CAP with USPS, PES	Week 4	Week 7	To CAP
2. Complete discussion guide for Town Meeting, with CAP concurrence	USPS, with PES, CAP	Week 7	Week 10	
3. Print discussion guide	USPS	Week 10	Week 11	
<b>D. TOWN MEETING PLANNING</b>				
1. Determine venue for Town Meeting	USPS, with CAP	Week 4	Week 6	
2. Plan resource support for town meeting	USPS, with PES	In Advance	Week 4	
3. Complete agenda and script for meeting	PES, with USPS	Week 10	Week 12	
4. Train facilitators and theme team, as required	PES	Week 11	Week 12	
5. Plan media coverage	USPS, with PES	Week 4	Week 12	To public
<b>E. CONDUCT TOWN MEETING</b>				
1. Facilitate town meeting	PES	Week 13	Week 13	
2. Produce reports	PES with USPS	Week 13	Week 13	
5. Measure for success of objectives of process	PES	Week 13	Week 13	
6. Provide results to decision-makers	PES	Week 13	Week 13	To USPS

<b>Action Step</b>	<b>Lead Others</b>	<b>Start Date</b>	<b>End Date</b>	<b>Information to Whom</b>
<b>F. CONSULT WITH CAP</b>				
1. Review and provide feedback proposal	CAP, with PES	Week 13	Week 22	
2. Plan accountability process	USPS, with CAP	Week 4	Week 22	
<b>G. ANNOUNCE PRELIMINARY RESULTS OF FEASIBILITY STUDY</b>				
1. Include talking points on influence of public engagement process on decision making	USPS, with CAP	Week 22	Week 24	To public
2. Include talking points on overall process and accountability on service delivery	USPS, with CAP	Week 22	Week 24	To public
<b>H. POST-IMPLEMENTATION REVIEW</b>				
1. Collect service-delivery data for comparison against baseline	USPS	Quarterly		To CAP
2. CAP reviews data	USPS, with CAP	Quarterly		To CAP
3. Provide data to public	USPS	Semi- annually		To public

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