

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

EVOLUTIONARY NETWORK DEVELOPMENT  
SERVICE CHANGES, 2006

Docket No. N2006-1

UNITED STATES POSTAL SERVICE  
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS  
TO AMERICAN POSTAL WORKERS UNION WITNESS MARGARET YAO  
(USPS/APWU-T1-1 THROUGH 11)

Pursuant to rules 25 and 26 of the Rules of Practice and Procedure, the United States Postal Service directs the following interrogatories and requests for production of documents to the American Postal Workers Union witness Margaret Yao: USPS/APWU-T1-1 through 11.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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### **USPS/APWU-T1-1**

Please refer to your testimony at page 15, line 7. There, you summarize requests for information directed to the Postal Service at public meetings regarding specific Area Mail Processing consolidation proposals as follows:

“Community members were not seeking state secrets: they were seeking data that could help them understand the Postal Service perspective.”

- (a) Please describe your experience on behalf of AmericaSpeaks as it relates to the public disclosure of data considered by the clients of AmericaSpeaks to be commercially-sensitive, proprietary or confidential, such that public disclosure would harm the economic or other interests of those clients. In doing so, please describe any commercial or revenue-generating enterprises in which your AmericaSpeaks clients engage. Please also describe the manner in which you or your clients may regard that they are in economic or commercial competition with other organizations.
- (b) Do any of your non-profit clients share donor or mailing lists with other similar organizations. If so, please describe the nature of the information organizations all of your clients

### **USPS/APWU-T1-2**

- (a) Please refer to USPS Library Reference N2006-1/5. Assume that, as a part of the review of each AMP mail processing and transportation consolidation proposal, the Postal Service, analyzes and relies upon mail volume and operations data that it regards to be commercially sensitive. Assume also that the Postal Service considers that the public disclosure of such data would result in private delivery firms such as Federal Express and United Parcel Service gaining an unfair advantage in competition for the provision of delivery services, to the economic detriment of the Postal Service and its employees.
  - (1) Please refer to the first paragraph of page 16 of APWU-T-1. Would you regard the Postal Service as “arrogant” if, while seeking public input regarding a particular AMP consolidation proposal, it determined that it was necessary to withhold some operational and volume data pertinent to that AMP proposal from public disclosure to protect the aforementioned economic interests? If so, please explain.
  - (2) What advice would you offer the Postal Service or what procedures would you recommend that it employ as it sought to strike a balance between providing the public with information regarding a

particular AMP proposal and protecting the above-referenced economic interests?

- (b) With regard to USPS Library Reference N2006-1/5, is it the position of the American Postal Workers Union that no harm could result to the economic interests of the Postal Service if data such as those described above in subpart (b) were routinely publicly disclosed? If so, please explain.
- (c) With regard to USPS Library Reference N2006-1/5, is it the position of the American Postal Workers Union that no harm could result to the economic interests of the American Postal Workers Union if data such as those described above in subpart (b) were routinely publicly disclosed? If so, please explain.

### **USPS/APWU-T1-3**

In the first paragraph of page 16 of APWU-T-1, you recount the example of a Federal regulatory agency manager. Please identify the particular agency involved and the year, describe the topic of the public meeting at which “frustrated . . . citizens . . . sought more and better information” and provide a citation to the Federal Register notice referenced on line 5.

### **USPS/APWU-T1-4**

- (a) Please provide a citation to “the promise of no degradation in overall service referenced at page 16, line 19 of APWU-T-1.
- (b) Does the document referenced at page 16, fn. 29 of APWU-T-1 promise no degradation in overall service in relation to any specific Area Mail Processing consolidation? If so, please provide a citation in that document to such a promise.

### **USPS/APWU-T1-5**

Please refer to lines 13-16 of page 34 of APWU-T-1. Describe the “political” interests that the Postal Service should consider and what weight they should be given as part of a determination of:

- (a) whether to shift certain operations from one mail processing plant in an effort to improve efficiency and reduce excess capacity;
- (b) whether a particular existing mail processing facility objectively deemed to be obsolete or to constitute excess capacity should be closed;

- (c) whether to consolidate or eliminate transportation operations between mail processing plants in an effort to improve efficiency and reduce excess capacity.

**USPS/APWU-T1-6**

Please refer to lines 13-16 of page 34 of APWU-T-1. Describe the “societal” interests that the Postal Service should consider and what weight they should be given as part of a determination of:

- (a) whether to shift certain operations from one mail processing plant in an effort to improve efficiency and reduce excess capacity;
- (b) whether a particular existing mail processing facility objectively deemed to be obsolete or to constitute excess capacity should be closed;
- (c) whether to consolidate or eliminate transportation operations between mail processing plants in an effort to improve efficiency and reduce excess capacity.

**USPS/APWU-T1-7**

Please refer to lines 13-16 of page 34 of APWU-T-1. Describe the “economic” interests that the Postal Service should consider and what weight they should be given as part of a determination of:

- (a) whether to shift certain operations from one mail processing plant in an effort to improve efficiency and reduce excess capacity;
- (b) whether a particular existing mail processing facility objectively deemed to be obsolete or to constitute excess capacity should be closed;
- (c) whether to consolidate or eliminate transportation operations between mail processing plants in an effort to improve efficiency and reduce excess capacity.

### **USPS/APWU-T1-8**

- (a) Please refer to line 3 of page 34 of APWU-T-1 where you mention “facility closings”. The footnote appended to that sentence refers to an Army weapons destruction project. Did that particular project involve a proposal to permanently or temporarily close a military facility? If so, please provide details and either copies of publicly available documents or internet citations to any publicly available documents describing that aspect of the proposal.
  
- (b) Please provide examples of the involvement of AmericaSpeaks in the organization of public town hall style meetings on behalf of other government agencies related to the closure or consolidation of government facilities.

### **USPS/APWU-T1-9**

Please refer to line 5 of page 18 of APWU-T-1.

- (a) Define what you mean by “Community identity, related to postmarks”.
  
- (b) Please provide the street, city, state and 5-digit ZIP Code addresses for AmericaSpeaks and the American Postal Workers Union.
  
- (c) Please provide a xerox copy of:
  - (1) an unused copy of a sheet of letterhead stationery typically used for external correspondence at each address provided in response to subpart (b);
  - (2) an unused copy of the front of a mailing envelope bearing the name, logo, and/or address of each organization.
  
- (d) For each address identified in response to subpart (b), please identify the postal facility by street address and/or 5-digit ZIP Code at which the organization’s outgoing stamped mail is routinely tendered for acceptance. If the stamped mail is not taken to a postal facility for acceptance, please describe the method by which it is tendered to the Postal Service or entered into the mail stream.

### **USPS/APWU-T1-10**

Please refer to line 23 of page 8 of your testimony, where you propose the establishment of “demographically balanced groups of citizens reflective of the impacted community.” What demographic factors or characteristics should the Postal Service consider in selecting the members of such groups?

**USPS/APWU-T1-11**

Please refer to page 29, fn. 52 of APWU-T-1.

- (a) Would you consider the objectives of the Postal Service's Evolutionary Network Development initiative to be more consistent with those of (1) the Pentagon's military Base Realignment and Closure (BRAC) process or (2) the determination of how to redevelop the World Trade Center site and establish an appropriate memorial for the victims of 9/11. Please explain your response.
  
- (b) Please describe your understanding of the public/citizen input meetings that are employed as part of the Base Realignment and Closure process.