

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

**Evolutionary Network Development
Service Changes, 2006**

Docket No. N2006-1

**RESPONSE OF THE AMERICAN POSTAL WORKERS
UNION, AFL-CIO, WITNESS YAO (APWU-T-1) TO USPS
INTERROGATORIES USPS/APWU-T1-1-11
(September 29, 2006)**

The American Postal Workers Union, AFL-CIO hereby submits the responses of witness Yao to the following interrogatories of the United States Postal Service: USPS/APWU-T1-1-11, filed on September 15, 2006. Interrogatories USPS/APWU-T1-2(b-c) and 9(c-d) have been redirected from witness Yao to the APWU for an institutional response.

Each interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

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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

Response:

- (a) In my experience, AmericaSpeaks' clients, who are mainly, but not exclusively, government and not-for-profit organizations, are concerned about how information is disclosed and received. They do possess sensitive information that they may even regard as "state secrets." Although they are not engaged in profit-making commercial ventures, many feel they compete to attract and/or sustain funding, whether from private or public sources. Given these sensitivities, we have at times signed nondisclosure statements in order to assist our clients. Our clients work together with us to determine the types of information necessary to inform the public about the issues at hand while still protecting information our clients regard as confidential.
- (b) I don't know.

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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.

Response:

- (a)(1) No. "Arrogance, with the best of intentions, doesn't get you very far," was a self-revelatory comment made by someone in another government agency whose group went through a rethinking of their attitudes toward public engagement. See my testimony on p. 16, lines 8-10.

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(2) First, it is not necessarily the case that the information deemed most critical will give competitors an unfair advantage. In other words, a balance does not necessarily need to be struck. I note that while people were dissatisfied with the AMP Summary Sheet (when it was provided), few of the questions raised at the town hall meetings and in Congressional correspondence would be answered by providing copies of the pertinent AMP. In fact, the data deemed most useful to customers and community leaders may not exist and may need to be collected. For example, studies of baseline and resulting service delivery through test mailings could be conducted in cooperation with third-party groups to the benefit of understanding service delivery impacts.

Also, a data dump on citizens at a public meeting will not be useful, whether or not the information is sensitive. In my testimony, starting on page 24, I outline how the creation of a small Citizen Advisory Panel (CAP) would help shape the broader town meeting and narrow its focus. I describe the potential make-up of the CAP on p. 25 and suggest on p. 25, lines 21-26, that the CAP could serve to:

- Inform decision-makers of specific community interests and concerns, identifying the critical information to be developed or shared
- Act as a sounding board to develop or react to feasibility of proposal and potential options....

To facilitate a free flow of communication, it may be necessary for the members of the CAP to sign nondisclosure agreements, which is not an unusual practice. The CAP would assist the Postal Service in identifying which information will be helpful in informing discussion and dialogue at a town meeting so as to inform the discussion but not disclose commercially sensitive information. For example, performance information might be shared in terms of trends, rather than single data points. Sensitive information could be shared in terms of percentages and percentage

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changes, rather than specific raw totals. Assumptions may be described to the satisfaction of the CAP; neither the CAP nor the public would likely need to, or want to, know labor or volume category specifics.

- (b) Referred to APWU for institutional response.
- (c) Referred to APWU for institutional response.

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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.

Response:

The year was 1999 and involved public health and safety issues. As noted on page 16, fn. 28, for purposes of confidentiality, quotes from federal employees participating in the knowledge-building network were included without attribution.

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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.

Response:

- (a) The promise of no degradation in overall service was made to the public in
- PowerPoint slides in USPS LR N2006-1/13, p. 18 of 21;
 - USPS Response to Interrogatory APWU/USPS-T2-113 (July 24, 2006), St. Petersburg summary (marked 1/55), p. 4 of 59; St. Petersburg PowerPoint slide 13, p. 17 of 58; Yakima summary (marked 18/55), p. 21 of 58; Yakima PowerPoint slide 11, p. 32 of 58; Jackson Summary (marked 33/55), p. 36 of 58; Jackson PowerPoint slide 12, p. 48/58.
 - USPS Response to Interrogatory APWU/USPS-T2-114(b) (August 11, 2006)

However, my point was that the promise of no degradation of service was made to the public while the AMP guidelines do not make such a promise.

- (b) The referenced document is USPS-LR-N2006-1/3, AMP Guidelines, Worksheet 7a. As the footnote indicates, the document makes no promise.

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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.

Response:

(a-c) Lines 13-15 of page 34 comprise a broad concluding remark, ending my testimony thus: "A strategy where all parties benefit by expanding consideration of the variety of economic, political, and societal interests to be considered is more likely to build understanding and goodwill toward the Postal Service and lead to better decisions." The variety of interests mentioned were intended to illustrate different ways the public might express its interests. Interrogatories USPS/APWU-T1 -5, 6, and 7 ask for a breakdown of the "political," "economic," and "societal" interests and the weight those interests should be given for specific scenarios. I did not intend a sharp distinction among the three, but I will try to draw some distinctions relating to the five public meetings held between April and June, 2006.

The "political interests" have focused largely on process. Based on my analysis, the political interests are most readily, but not exclusively, expressed in letters from Congressional representatives to the Postmaster General and GAO and are included in this case in APWU-LR-N2006-1/5.

These letters did not really question the general need for realignment, nor the specifics of the scenarios laid out in (a) through (c) of this question, but rather focus on the realignment process and how decisions would be

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made. For example, the June 19, 2006, letter from Rep. C.W. Bill Young acknowledges the pressure the Postal Service is under from increasing competition from other delivery services and the need to rein in costs. But, he points out, a facility "merger" is a major and probably irreversible decision. If the community is to understand the proposal, it requires information beyond anything shared at the June 14 public meeting. Representative Young seeks information about how past "mergers" have gone -- what did the Postal Service realize in benefits and impacts on service? He also wishes to understand and study the assumptions underlying the cost-benefit analysis and impacts on service in his area, and the alternatives that were considered, among other points.

Thus, regarding specific input to shifting or closing facilities and transportation operations, the letters indicate that the elected officials are concerned that the cost-benefit analysis include all relevant factors -- and they are uncertain that the Postal Service has or will consider factors they believe are relevant. My recommended public engagement process will help the Postal Service determine the bearing these factors should have on its realignment process. It includes an invitation to elected officials to oversee, consult, or participate in a small Citizen Advisory Panel (CAP) and the town meeting. This process will help build understanding and goodwill, as well as improve the decision process.

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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.

Response:

(a-c) Lines 13-15 of page 34 comprise a broad concluding remark, ending my testimony thus: "A strategy where all parties benefit by expanding consideration of the variety of economic, political, and societal interests to be considered is more likely to build understanding and goodwill toward the Postal Service and lead to better decisions." The variety of interests mentioned were intended to illustrate different ways the public might express its interests. Interrogatories USPS/APWU-T1 -5, 6, and 7 ask for a breakdown of the "political," "economic," and "societal" interests and the weight those interests should be given for specific scenarios. I did not intend a sharp distinction among the three, but I will try to draw some distinctions relating to the five public meetings held between April and June, 2006.

In mentioning "societal" interests, which also are likely to be political and economic, I was thinking of the emphasis some community leaders placed on the impact of slower service on certain segments of our society. For example, one community leader in Sioux City expressed considerable concern for "the poorest people, who have no other way to pay their bills [other than through mail service]." He was concerned that service impacts

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could slow down mail delivery, compelling those who can least afford them to end up paying late fees, interest charges, and the like. He suggested that a "community-wide education process should be mandated" to change expectations and behavior if slower service were to become the case.

Thus, regarding specific input to shifting or closing facilities and transportation operations, comments like these indicate concern that impacts on universal service delivery for certain segments of society should be part of the cost-benefit analysis, no matter which scenario. My recommended public engagement process will help the Postal Service determine the bearing these factors should have on its realignment proposals. It includes community leaders on a small Citizen Advisory Panel (CAP) and outreach to potentially unrepresented groups in the town meeting. This process will help build understanding and goodwill, as well as improve the decision process.

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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.

Response:

(a-c) Lines 13-15 of page 34 comprise a broad concluding remark, ending my testimony thus: "A strategy where all parties benefit by expanding consideration of the variety of economic, political, and societal interests to be considered is more likely to build understanding and goodwill toward the Postal Service and lead to better decisions." The variety of interests mentioned were intended to illustrate different ways the public might express its interests. Questions USPS/APWU-T1 - 5, 6, and 7 ask for a breakdown of the "political," "economic," and "societal" interests and the weight those interests should be given for specific scenarios. I did not intend a sharp distinction among the three, but I will try to draw some distinctions relating to the five public meetings held between April and June, 2006.

"Economic interests," which may also be political and include societal interests, references both the impact of the AMP proposals on users of the mail as well as the Postal Service's own economics that motivate the process. The impact on users includes the effects on large mailers, small businesses, and residential users. Business and civic leaders also have expressed concern for broader impact on a community's economic well-being.

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Thus, regarding specific input to shifting or closing facilities and transportation operations, comments indicate that economic impact, not just operating impact, should be part of the cost-benefit analysis, no matter which scenario. My recommended public engagement process will help the Postal Service determine the bearing these factors should have on its realignment proposals. It includes representation of mailers and community leaders on a small Citizen Advisory Panel (CAP) and broader outreach for participation in the town meeting. This process will help build understanding and goodwill, as well as improve the decision process.

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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.

Response:

- (a) The Army weapons destruction project did not involve any facility closures to my knowledge. The point was not about closures but about how public engagement becomes even more important when dealing with controversial subjects. These subjects might include environmental impact studies, scientific research, health care policy, or facility closings.
- The footnote then provided two examples of controversial subjects where community involvement was sought. One of those was the Army's project to destroy 30 tons of weapons, where a Citizens Advisory Technical Team became highly knowledgeable about the complex issues involved. In this situation, the controversial nature of the issues required citizens to deal with technical issues and sign nondisclosure agreements. Their eventual independent support of the Army's analysis lent credibility to the Army's process.
- (b) AmericaSpeaks, to my knowledge, has not facilitated town meetings related to the closure or consolidation of government facilities.

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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.

Response:

- (a) Page 18 of my testimony references concerns expressed by citizens about a variety of economic impacts on their communities. They mentioned timeliness of delivery of different types of mail and impacts on different types of customers, employment, and "community identity, related to postmarks." Some community members have expressed concern that losing the community's identifying postmark is a threat to maintaining community identity.

- (b) AMERICASPEAKS
1050 17th ST NW STE 701
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AMERICAN POSTAL WORKERS UNION, AFL-CIO
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- (c) The requested letterhead and envelope for AmericaSpeaks is attached. Each has been voided to prevent possible misuse. The request for APWU letterhead and envelope is referred to APWU.
- (d) I am not familiar with the handling of AmericaSpeaks' outgoing mail. As to APWU outgoing mail, the question is referred to the APWU.

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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?

Response:

Page 8 of my testimony references 10 guiding principles for effective public engagement, including "diversity – involve a demographically balanced group of citizens reflective of the impacted community." As a general rule, this means that for the areas of concern being addressed by a town hall meeting, outreach efforts are made to ensure perspectives of different impacted groups are represented in proportion to the demographics in that locale. For example, in Washington, DC-wide citizen summits, special outreach efforts are made to reach typically underrepresented groups in these forums, such as youth, certain ethnic groups, or residents of a particular sector of the city.

For the Postal Service, the factors or characteristics should be reflective of the geography of the area under consideration and the different types of users of the postal system that are likely to be affected. The key is to understand the range of concerns of different types of users, e.g., the elderly are more likely to rely on First-Class mail to receive prescription medications than young adults in an area. Characteristics may include rural, suburban, and urban residents; income; age; businesses by type, size, location; employees; non-employees; and so on.

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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.

Response:

- (a) I first will state my understanding of the objectives of the different examples you have cited and then state my opinion about their similarities and differences.

As I understand them, the objectives of END, which involve the use of computer simulations combined with AMP guidelines, are for the USPS to identify operations and network changes that could create a more flexible distribution and transportation network, reduce transportation costs, reduce redundancy, and reduce postal costs. A public comment process was added to END later.

As I understand it, the objective of the BRAC process is to provide for an independent commission to gather facts, including public comment, in order to make its own recommendations on the Defense Department's proposed base realignment and closure candidates.

Regarding determination of how to redevelop the WTC site and the 9/11 memorial, I referenced in my testimony the "Listening to the City" (LTC) public input process in 2002, where public input on building concepts and memorial priorities was sought early in a process before recommendations were developed.

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In analyzing similarities and differences among these examples, it appears that END and BRAC both involve public comment late in a process, whereas the WTC-LTC process entailed early consideration. But, END and WTC-LTC provide for public input directly to the originators of the recommendations, whereas BRAC entails consideration of public input by a select group of citizens, acting independently.

So, it would appear to me that the objective of the BRAC process is to make prominent a third-party analysis and review of realignments and closures. It is hard to compare these three examples. Given the BRAC approach's third-party involvement, however, I would say that WTC-LTC and END are more similar than BRAC and END in their objectives in that WTC-LTC did not entail third-party analysis but did entail public input directly to decision-makers as END does.

- (b) I have no specific knowledge or expertise in the BRAC process, other than my awareness of the process from living in Washington, DC, and reading the local newspaper.