

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

SIX-DAY TO FIVE DAY STREET DELIVERY
AND RELATED SERVICE CHANGES, 2010

Docket No. N2010-1

RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS NERI
TO INTERROGATORIES OF DOUGLAS CARLSON
(DFC/USPS-T4-18 and 20)

The United States Postal Service hereby provides the responses of witness Frank Neri to the following interrogatories of Douglas Carlson dated April 22, 2010: DFC/USPS-T4-18 and 20. Each interrogatory is stated verbatim and is followed by the response.

Responses to interrogatories DFC/USPS-T4-17 and 19 are forthcoming. Interrogatory DFC/USPS-T4-21 has been redirected to Postal Service witness Luke Grossmann for a response that is being filed separately today.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS FRANK NERI
TO INTERROGATORY OF DOUGLAS CARLSON**

DFC/USPS-T4-18

Please refer to your response to DFC/USPS-T4-7. For every processing facility that processes outgoing First-Class Mail on Saturdays, please explain whether the Postal Service considered an area mail processing plan that would have forwarded that facility's outgoing First-Class Mail to another facility for processing, and, if the Postal Service considered such a plan, please explain the specific reasons why such a plan was not implemented.

RESPONSE

The response to T4-7 lists mail processing facility pairs, each of which identifies a Processing and Distribution facility whose Saturday outgoing operations are now performed at a nearby plant. The present interrogatory refers to these latter processing facilities. It seems fair to interpret it as asking whether the Postal Service has also ever considered conducting a USPS Handbook PO-408 AMP consolidation of such plants' outgoing operations. The best answer we can provide is that it is possible.

Both Saturday consolidations and AMP consolidations can be proposed at the local level. AMP consolidation analysis can also be initiated by Headquarters. So, it is possible that somewhere between the field and Headquarters – at some point before, concurrently with, or after a Saturday consolidation – someone within the Postal Service may have considered whether to conduct a USPS Handbook PO-408 AMP consolidation of the latter facility's operations. A District or Area may contemplate a Handbook PO-408 AMP consolidation and undertake related analysis, but the proposal may never reach Headquarters for consideration. A local proposal could reach Headquarters but be deemed inconsistent with some overarching network plan and be

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denied by Headquarters. Whether initiated locally or as part of a national network plan, an AMP consolidation proposal could be denied if it is determined that the receiving facility lacks capacity to perform the operations that would be shifted to it, or if estimated cost savings are deemed insufficient to pursue, or if service would change beyond an acceptable level. None of this, in the Postal Service's view, has any bearing on the request in this docket.

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DFC/USPS-T4-20

Please refer to your response to DFC/USPS-T4-7. For each facility whose outgoing mail is forwarded to two other facilities for processing on Saturdays, please explain how the Postal Service determines to which facility to send the forwarding facility's mail. For example, is the split based on shape or class of mail or time of day?

RESPONSE

District managers are empowered to make the decision to consolidate Saturday cancellations and outgoing distribution. As such, the opportunities are evaluated and the decisions are made at the local level. Such considerations as those described in the question may come into play.