

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

MAIL PROCESSING NETWORK RATIONALIZATION
SERVICE CHANGES, 2011

Docket No. N2012-1

**RESPONSES OF UNITED STATES POSTAL SERVICE
WITNESS DAVID WILLIAMS
TO NATIONAL ASSOCIATION OF LETTER CARRIERS INTERROGATORIES
(NALC/USPS-T1-1 THROUGH 4)**

The United States Postal Service hereby files the responses of witness David Williams to the above-listed interrogatories of the National Association of Letter Carriers dated January 17, 2012. Each interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS
DAVID WILLIAMS
TO NATIONAL ASSOCIATION OF LETTER CARRIERS INTERROGATORY**

NALC/USPS-T1-1

On page 7, line 19, you refer to service levels “to which postal customers have long been accustomed.” How long has USPS had in place the current first-class mail service standards that USPS now proposes changing?

RESPONSE

The current First-Class Mail service standard business rules have been in effect since December 2007. In the main, they are based on the one-to-three day service standard range that is at least several decades old.

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NALC/USPS-T1-2

Has USPS ever before this proceeding proposed reducing the current first-class mail service standards? If so, please indicate when, why USPS proposed the change, and why the change was not implemented.

RESPONSE

If the question is asking whether the First-Class Mail service standards established in accordance with the December 2007 business rules have since been changed to result in a reduction in service, the answer is negative. If the question is asking whether the Postal Service has previously proposed that First-Class Mail service standard day ranges or business rules be changed to result in a reduction of service, the answer is twice.

As part of the December 2007 establishment of the modern service standards, the Postal Service proposed that the day ranges in excess of three days be implemented for some First-Class Mail to and from Alaska, Hawaii and the U.S. territories. This mail had long been subject to the general 1-to-3-day First-Class Mail service standard range. See 72 Fed. Reg. 72228 (December 19, 2007).

Previously, the Postal Service proposed First-Class Mail service standard business rule changes that would result in reductions from overnight to 2-day and from 2-day to 3-day for numerous origin-destination 3-digit ZIP Code pairs. See the USPS testimony filed in PRC Docket No. N89-1. In both instances, the proposed changes were implemented.

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NALC/USPS-T1-3

On page 20, line 12 of your testimony, you refer to "*intra*-SCF Single-Piece mail."
Did you mean "inter," instead of "intra"?

RESPONSE

No.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS
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NALC/USPS-T1-4

Did USPS undertake any effort to determine (a) by how much it could optimize or rationalize its mail processing network or reduce its mail processing capacity *without* changing its current service standards and (b) how much it would save if it implemented such an optimization, rationalization or reduction without changing its current service standards? If so, please provide any savings estimates and explain how USPS arrived at them.

RESPONSE

See my response to GCA-T1-1(a).