

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

MAIL PROCESSING NETWORK RATIONALIZATION  
SERVICE CHANGES, 2012

DOCKET NO. N2012-1

INTERROGATORIES OF THE NATIONAL NEWSPAPER ASSOCIATION  
TO UNITED STATES POSTAL SERVICE WITNESS WILLIAMS  
NNA/USPS T1 1-14  
(February 23, 2012)

Pursuant to Rules 25 and 26 of the Commission's Rules of Practice, National Newspaper Association (NNA) submits interrogatories and requests for documents to United States Postal Service Witness David Williams. Document requests include requests for responsive information for any record within the Postal Service's possession, whether in printed or electronic form. NNA respectfully requests that if the witness cannot respond to any interrogatory, the Postal Service will refer the question to a competent witness or provide an institutional response.

Respectfully submitted,  
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## **NNA/USPS T1-1**

**Please refer to your response to GCA/USPS T1-1, where you stated:**

“The Critical Entry Times (CETs) for Periodicals Flats were modified to conform the service standard requirement of this mail class with the processing requirements in an Flats Sequencing System (FSS) environment in May of 2011.”

- a. Is the intention to sort Periodicals Flats on FSS machines the sole driving factor in changes in CETs? If not, please list other factors.
- b. Do transportation schedules also affect CETs?
- c. Are you aware of any facilities where newspaper Periodicals or Standard mail is sorted on the FSS machines? If so, please list the facilities.

## **NNA/USPS T1-2**

Has the Postal Service determined that:

- a. Some percentage of intra-SCF First-Class mail from a closing facility will be handled by a hub within a zone of the gaining facility?
- b. Some percentage of intra-SCF Periodicals from a closing facility will be handled by a hub within a zone of the gaining facility?
- c. Some percentage of intra-SCF Standard mail from a closing facility will be handled by a hub within a zone of the gaining facility?

## **NNA/USPS T1-3**

If your response to any part of NNA/USPS T1-4 is yes, has the Postal Service requested proposals for the operation of hubs:

- a. From private contractors
- b. From worker groups within USPS

If a request for proposals has been publicly issued, please provide a copy.

## **NNA/USPS T1-4**

If your response to any part of NNA/USPS T1-4 is yes, has the Postal Service requested proposals for the transportation of mail between hubs or to and from the hubs and the gaining facility.

- a. From private contractors
- b. From worker groups within USPS

If a request for proposals has been publicly issued, please provide a copy.

#### **NNA/USPS T1-5**

If the Postal Service succeeds in creating the types of hubs referred to in the previous questions, will the “Intra-SCF” mail moving through the hubs:

- a. Be carried only if in containers sorted to 5 digit or carrier route; or
- b. Be broken down if some 5 digit or carrier route bundles are presented in containers sorted to the 3 digit or lower schemes

#### **NNA/USPS T1-6**

What type of facility would be required if the Postal Service set up intra-SCF hubs? If any facilities being studied in the AMP process are candidates for housing such a hub, please explain what criteria would be used to determine that the facilities are candidates for use as a hub.

#### **NNA/USPS T1-7**

Do you anticipate that Business Mail Entry Units:

- a. will be set up or preserved in existing facilities that are converted to intra-SCF hubs?
- b. will be set up in new facilities that are used as intra-SCF hubs?
- c. may be operated by contractors in the event non-USPS personnel are chosen to operate such hubs?

#### **NNA/USPS T1-8**

If intra-SCF hubs are set up to handle some mail, how would you expect CETs to be determined for mailers aiming at a Day Zero entry?

#### **NNA/USPS T1-9**

If you anticipate that a CET in a hub would be set more than an hour earlier than existing in a current entry plant, please explain why you would expect that result?

**NNA/USPS T1-10**

Has the Postal Service performed any analysis on the volume of First-Class, Periodicals and/or Standard Mail that may be maintained at current service levels if intra-SCF hubs are set up? If so, please provide the results.

**NNA/USPS T10-11**

In light of the Postal Service's public announcement on February 23 that determinations had been made on the facilities to be closed, were any announcements made or communications made to mailers in the affected facilities about the Postal Service's deliberations or plans to set up intra-SCF hubs? If so, please provide a copy of any instructions given to postal personnel with regard to such announcements. If not, please explain why not.

**NNA/USPS T10-12**

Please confirm that to comply with the Postal Accountability and Enhancement Act of 2006, USPS retained IBM as a consultant to study service standard compliance for Within County and that a report resulting from such study was supplied to the Postal Regulatory Commission. If you do not confirm, please explain why. If you do confirm, please identify the docket number and date of the filing of such report.

**NNA/USPS T10-13**

Please confirm that USPS conducts no separate studies of service standard compliance for Within County Periodicals mail but instead uses Outside County Periodicals mail data as a proxy.

**NNA/USPS T10-14**

As you have participated in the analysis that led to the Postal Service's proposal in this docket, have you considered any impact of service changes on Within County Periodicals mail, as opposed to other mail within the Periodicals product group? If so, please describe your conclusions.