

Before the
POSTAL REGULATORY COMMISSION
Washington, DC 20268-0001

Mail Processing Network Rationalization)	
Service Changes, 2012)	Docket No. N2012-1
)	
)	

NATIONAL POSTAL MAIL HANDLERS UNION INTERROGATORIES TO USPS
WITNESS DAVID WILLIAMS (NPMHU/USPS-T1-13-23)

Pursuant to Rules 25 through 28 of the Commission’s Rules of Practice and Procedure, the National Postal Mail Handlers Union (“NPMHU”) hereby submits the following interrogatories to USPS witness David Williams, USPS-T1. If the witness is unable to respond to any interrogatory, please redirect the interrogatory to a more appropriate USPS witness.

Instructions and Definitions

“USPS” or “Postal Service” means the United States Postal Service, its employees, agents, witnesses, and all other persons who act under the direction of the United States Postal Service, including but not limited to consultants and other independent contractors.

“Mail Processing Network Rationalization Service Changes, 2012” (MPNR) or means the proposed restructuring of the USPS’s mail distribution and transportation

network presented to the PRC in its December 5, 2010 “Request of the United States Postal Service for an Advisory Opinion on Changes in the Nature of Postal Services.”

“MNPR Network” means the mail distribution and transportation network required to implement the USPS’ MNPR and that, inter alia, accommodates the USPS’s elimination of 252 mail processing facilities.

“Documents” has the meaning as ascribed within the federal Rules of Civil Procedure and includes any documents or things that constitute or contain matters that are relevant to the subject matter of this proceeding and that are in the custody or control of the USPS.

“Losing facility” is defined and used herein in the same manner as it is defined and used in Section 1-1.2 of the PO-408 handbook.

“Gaining facility” is defined and used herein in the same manner as it is defined and used in Section 1-1.2 of the PO-408 handbook. The term document has the same meaning as ascribed within the federal Rules of Civil Procedure.

The term “person” means any natural person, corporation, partnership, proprietorship, association, organization or group of natural individuals.

The term “identify,” when used with regard to a person means to provide the full name, position, address and telephone number of the person.

The term “identify,” when used with regard to a document means to describe the subject matter of the document, its author, its date and any addressee.

Interrogatories

NPMHU/USPS -T1-13 Please provide all documents associated with the AMP studies that were listed in <http://about.usps.com/what-we-are-doing/our-future-network/assets/pdf/communications-list-022212.pdf>, including the studies that were disapproved.

NPMHU/ USPS -T1-14 Please explain why the list published by the Postal Service on February 23, 2012 at <http://about.usps.com/what-we-are-doing/our-future-network/assets/pdf/communications-list-022212.pdf> contains 264 studies, whereas the list provided as Library Reference 6 contains 252 studies. In your answer, please identify the studies that are contained in February 23, 2012 list but not in Library Reference 6 (including but not limited to Mid-Florida P&DC into Orlando P&DC; Atlanta P&DC; Champaign P&DF; Cardiss Collins P&DC; Staten Island P&DF; Mankato P&DF; Corpus Christi P&DC; and Fort Worth P&DC), and an explanation of why those studies were not contained in Library Reference 6.

NPMHU/ USPS -T1-15 For those sites included in the list published on February 23, 2012 but not included in Library Reference 6, please state whether the full Handbook 408 process was followed for each of these studies, including in your answer the date of the public hearing.

NPMHU/ USPS -T1-16 Please explain why certain sites (including but not limited to, Burlington VT P&DF, and Manasota, FL P&DC) are included in Library Reference 6, but

not included in the list published on February 23, as published at

<http://about.usps.com/what-we-are-doing/our-future-network/assets/pdf/communications-list-022212.pdf>.

NPMHU/ USPS -T1-17 Please confirm that the AMP studies for Burlington VT and Manasota, FL P&DC has been disapproved. If not confirmed, please explain the status.

NPMHU/ USPS -T1-18 Please confirm that the website identified by witness Susan LaChance on page 6 of her testimony, <http://about.usps.com/streamlining-operations/area-mail-processing.htm>, which provided dates of and links to the proposals for AMP studies and community presentations for public meetings, has been taken down by the Postal Service.. If not confirmed, please explain why this statement is incorrect and where on the Postal website this information may now be found. If confirmed, please explain why this information was taken down.

NPMHU/ USPS -T1-19 Please explain the Postal Service's plans for updating or revising the information provided to the Postal Regulatory Commission regarding the anticipated cost savings and design of the future network, given the results of the decisions released on February 23, 2012. In your answer, please specify which specific testimony, library references, and interrogatory responses will be updated or revised, and provide specific dates or time frames in which such testimony or library references will be updated or revised.

NPMHU/ USPS -T1-20 Please confirm that certain facilities considered for consolidation were not studied through the Handbook 408 process. If confirmed, please state for which facilities the Handbook 408 process was not used; explain the decision-making process that was used; and state whether there was a public hearing for each of these facilities.

NPMHU/ USPS -T1-21 Which of the consolidations approved, as listed on the list published on February 23, 2012, are only feasible or beneficial for the Service if the proposed change in service standards currently pending before the Commission is implemented?

NPMHU/ USPS -T1-22 Please identify any and all steps that the Postal Service intends to take prior to May 15, 2012, in order to prepare for the planned consolidations, including in your answer the anticipated date or time frame in which the Postal Service intends to take each step, including, for instance: (a) reprogramming of processing machines to expand the processing window; (b) moving equipment from losing facilities to gaining facilities; (c) selling or decommissioning excess equipment; (d) issuing excessing notices to employees; (e) renegotiating HCR contracts for transporting mail in the redesigned network; and (f) negotiating or entering into contracts to operate hub or cross-dock transfer stations.

NPMHU/ USPS -T1-23 Please identify any and all steps that the Postal Service intends to take after May 15, 2012, in order to prepare for the planned consolidations,

including in your answer the anticipated date or time frame in which the Postal Service intends to take each step, including, for instance: (a) reprogramming of processing machines to expand the processing window; (b) moving equipment from losing facilities to gaining facilities; (c) selling or decommissioning excess equipment; (d) issuing excessing notices to employees; (e) renegotiating HCR contracts for transporting mail in the redesigned network; and (f) negotiating or entering into contracts to operate hub or cross-dock transfer stations.

Respectfully submitted,

Patrick T. Johnson

As agent for and authorized by

Andrew D. Roth

Kathleen M. Keller

Bredhoff & Kaiser, P.L.L.C.

805 Fifteenth Street, N.W.

Suite 1000

Washington, DC 20005

(202) 842-2600

*Counsel for National Postal
Mail Handlers Union*

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