

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 EMILY ROSENBERG
TO AMERICAN POSTAL WORKERS UNION INTERROGATORIES
APWU/USPS-T3-23, 28 and 30**

The United States Postal Service hereby files the responses of witness Emily Rosenberg to the above-listed interrogatories of the American Postal Workers Union. T3-23 was dated February 14, 2012. T3-28 was dated February 24, 2012. T3-30 were dated February 27, 2012. Each interrogatory is stated verbatim and followed by the response. Responses to T3-22 and T3-29 are forthcoming.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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**RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS ROSENBERG
TO APWU INTERROGATORY**

APWU/USPS-T3-23 In "NP2_FY2010 Workload Volume by Operation Type.xls", tab 'PRI', column E ("MODS"), five different rows report data for the NDCs Washington, Cincinnati, Des Moines, St. Louis, and Kansas City (similarly, 10 different NDCs are reported in column D ("Survey - ADC")).

- a) Please explain the difference between "Survey ADC" (Column D, "PRI" tab) and "MODS" (Column E, "PRI" tab)
 - i) Clarify why the Survey ADC Springfield MA NDC in (Column D, row 20) corresponds to the MODS Springfield MA PMPC (Column E, row 20)
- b) Please explain why 'PRI' data are reported for as subset of the 22 NDCs (10 reported in Column D of the 'PRI' tab, corresponding to 5 in Column E of the 'PRI' tab).
 - i) If more than these reported NDCs conduct sorting operations on 'PRI', please provide us all pertinent data for all NDCs conducting sorting operations on PRI, consistent with the data included in the 'PRI' tab.
 - ii) If only a subset of NDCs conduct sorting operations on 'PRI', please identify which NDCs conduct sorting operations on 'PRI' and please explain why.
 - a. Please provide all pertinent data for these NDCs, consistent with the data included in the 'PRI' tab.
- c) Also, if one or more NDCs conduct sorting operations on parcels other than Priority-Mail parcels, please explain why there are no rows in 'P-OGP' or 'PINP' reporting parcel data for such NDCs.
 - i) Moreover, if one or more NDCs conduct sorting operations on parcels, other than Priority-Mail parcels, please provide all pertinent data consistent with the data in tabs 'P-OGP' and 'P-INP'.
- d) If one or more NDC5 conduct sorting operations on First-Class Mail letters and/or flats, please explain why there are no rows in tabs 'L-OGP', 'L-OGS', 'L-INP', 'F-OGP', 'F-OGS', or 'F-INP' reporting letters/flats data for these NDCs.
 - i) Moreover, if one or more NDCs conduct sorting operations on First-Class Mail letters and/or flats, please provide all pertinent data consistent with the data in tabs 'L-OGP', 'L-OGS', 'L-INP', 'F-OGP', 'F-OGS', or 'F-INP'.

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RESPONSE to APWU/USPS-T3-23

- a) The “Survey - ADC” contains the ZIP assignments received during a Priority Mail processing field survey conducted in 2010. The “Survey – ADC” site was mapped to the representative “MODS” site that processed Priority volume in FY2010 when no Priority Mail processing data existed for the “Survey – ADC” site.
 - (i) In MODS, the Springfield MA NDC did not contain processing data for Priority Mail. Therefore, those ZIP Codes were mapped to the Springfield MA PMPC, which did contain processing data for Priority Mail for the applicable ZIP Codes.
- b) This is the result of differences between the Priority Mail processing survey conducted in 2010 and where the applicable MODS volume was actually reported.
 - (i,ii,a) The “MODS” site data contained in the reference NP2_FY2010 Workload Volume by Operation Type.xls are consistent with Priority Mail processing for FY2010.
- c)
 - (i) Other than Priority Mail, Network Rationalization did focus on NDC processing. The initial and final processing of P-OGP and P-INP were within scope and therefore mapped to the applicable OPDC and DPDC for each ZIP Code.
- d)
 - (i) The FY2010 MODS data do not contain any FCM volume processed at NDCs.

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APWU/USPS-T3-28 Please refer to USPS Library Reference N2012-1/NP2, tab 'Model MODS', and specifically to the MODS volumes in columns B-O, and the square feet units in columns P-X.

- a) Cell P32 refers to these column P-X values as Sqft/HR. Please confirm that they are actually values for Sqft.
- b) With respect to the L-OGP MODS volumes in column C of 'Model MODS', please confirm that any given column-C L-OGP volume always converts into the exact same column-Q L-OGP Sqft value, regardless of the ZIP3 reported in column A. For example, if three different rows report the same column-C L-OGP MODS volume, please confirm that these three rows also report the same column-Q LOGP Sqft values. If you do not confirm, please explain how the same column-C volume reported for two or more ZIP3s can convert into different L-OGP Sqft.
- c) Similarly, with respect to the L-INP MODS volumes in column E of 'Model MODS', please confirm that any given column E volume always converts into the same column-R L-INP Sqft value, regardless of the ZIP3. If you do not confirm, please explain.
- d) With respect to the P-OGP, P-INP, PRI-O, and PRI-I volumes in columns L through O of 'Model MODS', please confirm that any given sum over these column L-O volumes always converts into the same column-X P/PRI-OGP/INP Sqft value, regardless of ZIP3. If you do not confirm, please explain.

RESPONSE:

A. Confirmed. The formula used in cell P32 is as follows:

$$\frac{(\text{ZIP Code 005's Cancellation Workload} * \text{AFCS Footprint})}{(\text{AFCS Throughput} * \text{Cancellation Operating Window})}$$

Thus,

$$\frac{(\text{Pieces} * \text{Square Feet})}{(\text{piece per hour} * \text{hours})} = \text{Square Feet}$$

B. Confirmed.

C. Confirmed.

D. Confirmed. At this stage of modeling, Priority windows were not distinct from other parcel processing.

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APWU/USPS-T3-30 Please refer to USPS Library Reference N2012-1/13, tab 'ODIS'.

- a) Please confirm that the total First-Class Mail volumes reported in this tab by ZIP3 and volume category (L-INP, F-INP, etc.) exclude First-Class Presort mail pieces for which Origin ZIP Codes are unknown.
- b) If confirmed, please explain why this absence of Origin ZIP Codes justifies excluding the mail pieces from computations of total pieces for incoming sortation categories such as L-INP, L-INS1, L-INS2, F-INP, and F-INS.

RESPONSE:

- A. Not confirmed. Volume without Origin 3-Digit ZIP Code is included and redistributed using the distribution of data points with Origin information.
- B. Not applicable.