

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

MAIL PROCESSING NETWORK  
RATIONALIZATION SERVICE CHANGES, 2012

DOCKET No. N2012-1

**RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS MARTIN TO  
FOLLOW-UP INTERROGATORIES OF THE AMERICAN POSTAL WORKERS  
UNION, AFL-CIO (APWU/USPS-T6-12, 13 AND 17 THROUGH 19)**

The United States Postal Service hereby provides its responses to the above-listed follow-up interrogatories of the American Postal Workers Union (APWU), AFL-CIO, dated March 2, 2012. Each interrogatory is stated verbatim and is followed by the response. The responses to APWU/USPS-T6-14 through 16 and 20 are forthcoming.

Respectfully submitted,

UNITED STATES POSTAL SERVICE  
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**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MARTIN  
TO AMERICAN POSTAL WORKERS UNION, AFL-CIO INTERROGATORY**

**APWU/USPS-T6-12.** For the following questions please refer to the worksheet that accompanies your response to APWU/USPS T-6-1.

- a) The final PIR for Manasota to Tampa records no PVS mileage even though the AMP proposed no change in Tampa PVS and PVS service continues. Please confirm that the final PIR results in an overestimation of miles reduced associated with this AMP. If you cannot confirm, please detail when and how the PVS reductions were achieved.
- b) Please confirm that the PIR summary for Manasota to Tampa states that PVS savings are “irrelevant to the AMP implementation” and that “[e]ach of the PVS changes and the savings are attributable to streamlining operations and not a part of the AMP savings.” If you cannot confirm, please detail when and how the PVS reductions were achieved.
- c) Please confirm that based on the AMP summary, 78% of the HCR savings that appear in this PIR resulted from “routes that were eliminated not due to this AMP.” If you cannot confirm, please detail when and how the HCR reductions were achieved.
- d) Please provide any corrected PIR.
- e) Please provide any corrected numbers in your worksheet.

**RESPONSE:**

- (a) Confirmed.
- (b) Confirmed.
- (c) I confirm that the quoted statement appears in the PIR. However, in my view, the AMP consolidation enabled the elimination of routes, thereby resulting in a reduction in savings.
- (d) A corrected PIR is unavailable at this time.
- (e) Please see the worksheet labeled “Attach.Resp.APWU.T6.12.13.17-19.xls” attached to this response.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MARTIN  
TO AMERICAN POSTAL WORKERS UNION, AFL-CIO INTERROGATORY**

**APWU/USPS-T6-13.**

- a) The first PIR for Dulles to No. Virginia (Merrifield) records no PVS mileage even though the AMP proposed no change in No. Virginia (Merrifield) PVS mileage and PVS service continues. Please confirm that the first PIR results in an overestimation of miles reduced with this AMP. If you cannot confirm, please detail when and how the PVS reductions were achieved.
- b) Please provide any corrected PIR.
- c) Please provide any corrected numbers in your worksheet.

**RESPONSE:**

- (a) Confirmed.
- (b) A corrected PIR is unavailable at this time.
- (c) Please see the worksheet labeled "Attach.Resp.APWU.T6.12.13.17-19.xls" attached to this response.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MARTIN  
TO AMERICAN POSTAL WORKERS UNION, AFL-CIO INTERROGATORY**

**APWU/USPS-T6-17.**

- a) Please provide the calculations for the positive 725,543 change in transportation mileage for the first PIR for Dallas, TX to North Texas. Please explain why the number is not 821,023.  
[(2,670,545+1,580,334+98,648)-(2,160,514+1,329,420+38,570)]
- b) Please provide an explanation for the large negative cost adjustment on the Dallas, TX PIR column that has no associated mileage.
- c) Please provide any corrected PIR.
- d) Please provide any corrected numbers in your worksheet.

**RESPONSE:**

- (a) The transportation change was not calculated correctly. The calculation should yield a change of 821,023 in transportation mileage.
- (b) The negative cost figure reflects a one-time adjustment to the HCR contract for a financial settlement with the supplier. This cost should not have been included in transportation-reduction estimate.
- (c) A corrected PIR is unavailable at this time.
- (d) Please see the worksheet labeled "Attach.Resp.APWU.T6.12.13.17-19.xls" attached to this response.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MARTIN  
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**APWU/USPS-T6-18.**

- a) Please confirm that the Flint to Metroplex originating mail information came from the Final PIR rather than the 1st PIR.
- b) The first PIR for Flint to Metroplex originating mail indicates that the “vast majority of the [transportation] savings was due to the unprecedented reduction in mail volume over the last two years.” Does this indicate that most of these savings were not a result of the consolidation but rather a normal reconfiguration of transportation routes? If so, please provide the numbers associated with the AMP.
- c) Please provide any corrected PIR.
- d) Please provide any corrected numbers in your worksheet.

**RESPONSE:**

- (a) Confirmed.
- (b) Not necessarily. The quoted statement from the PIR does not, in and of itself, support the assertion in the second sentence of part (b) of the interrogatory (i.e., that most of these savings were not a result of the consolidation but rather a normal reconfiguration of transportation routes).  
  
Transportation savings identified in the first PIR appear to have been achieved through a combination of local and nationwide initiatives to reduce transportation cost as well as the AMP consolidation, which resulted in the realignment of transportation to shift originating mail operations.
- (c) N/A
- (d) No corrections to the numbers in the worksheet are warranted by this response. However, the worksheet has been updated to reflect that the information came from the final PIR (see Column A, titled “Study”). See attachment “Attach.Resp.APWU.T6.12.13.17-19.xls.”

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MARTIN  
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**APWU/USPS-T6-19.** The summary of transportation changes in the Hickory to Greensboro final PIR include a discussion of two added routes from Hickory to act as HUBs. These routes are not included in the detailed HCR calculations in the PIR.

- a) Are these not included in the PIR because they are not directly applicable to the consolidation?
- b) Would these routes be typical of the type of hubbing operations that your testimony indicates would be used in the new configuration of facilities?

**RESPONSE:**

- (a) The two routes to which this interrogatory refers are HCR 286L2 and HCR 28635. Both routes were added in the first PIR due to the AMP consolidation. The first PIR identified an increase in annual mileage and cost at that time. I assume that the reason these routes were not included in the final PIR is because there was no impact to mileage or cost between the first PIR and the final PIR.
- (b) I interpret this interrogatory as referring to page 5 of my testimony (USPS-T-6), lines 6 and 7. The answer is no.