

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

MAIL PROCESSING NETWORK
RATIONALIZATION SERVICE CHANGES, 2012

DOCKET No. N2012-1

**OBJECTIONS OF THE UNITED STATES POSTAL SERVICE TO
AMERICAN POSTAL WORKERS UNION, AFL-CIO INTERROGATORIES
(APWU/USPS-T6-28 THROUGH 37)
(April 16, 2012)**

The United States Postal Service hereby objects to the above-identified interrogatories of the American Postal Workers Union (APWU), AFL-CIO, filed on April 6, 2012. The interrogatories are repeated below and followed by a statement of the basis for the objections.

APWU/USPS-T6-28. State separately the number of PVS routes and the number of HCR routes in each of the following categories:

- Inter-Area
- Inter-Cluster
- Inter-P&DC
- Intra-P&DC

APWU/USPS-T6-29. For each of the following types of routes, state the average miles per route and the average cost per route for PVS routes and, separately, for HCR routes:

- Inter-Area
- Inter-Cluster
- Inter-P&DC
- Intra-P&DC

APWU/USPS-T6-30. You have testified (page 5, line 3) that: “The long haul network refers to transportation by HCR providers that connects postal facilities more than 300 miles apart.” What is the basis for using 300 miles for such segmentation – is it cost or operational limitations? Is this dividing line used because transportation between postal facilities that are less than 300 miles apart is less suitable for HCR providers than other, longer routes?

APWU/USPS-T6-31. You testified (p. 5, line 9) that: “Generally, a truck

run that is routinely less than sixty (60) percent full is directed to a consolidation facility so that the Postal Service can take full advantage of the truck's carrying capacity."

- a. Is the 60% full designation of truck utilization by Mail Transfer Equipment (MTE) or by actual mail volume?
- b. Does the 60% full designation include empty MTE – that is if a full truck is carrying 50% of MTE that are fully laden and 20% of MTE that are empty, does this load run direct or through consolidation point?
- c. Has the USPS ever engaged in estimating the cube utilization of routes by actual mail cube (not MTE) as a percentage of vehicle cube? If yes, provide examples.
- d. What is the basis for using 60 percent for such decisions – how is the type and size of truck factored into such decision process, and how is the costing adjusted if a smaller truck can be used that provides for 80 percent or 100 percent utilization and reduces operating cost?

APWU/USPS-T6-32. For each of the following types of routes, state how many trucks are directed for consolidation in each category, and state what percentage of trucks in category are directed for consolidation:

- Inter-Area
- Inter-Cluster
- Inter-P&DC
- Intra-P&DC

APWU/USPS-T6-33. On the limited number of plants where studies have been conducted, what is the distribution of cube utilization of vehicle dispatch of Inter- P&DC routes in the following ranges?

- 0-25%
- 21-50%
- 51-75%
- 76-100%

APWU/USPS-T6-34. Since the new Inter-P&DC trips illustrated in Figure 2 of your testimony will be longer than the trips in Figure 1 of your testimony on nine (9) of the ten (10) current routes, has this been accounted for in the potential savings of consolidation?

APWU/USPS-T6-35. Did the studies conducted account for both length of haul and cube utilization with actual plant dispatches (e.g. If all plant dispatches in Figure 1 of your testimony from A to C are 100% then in the consolidated plant scenario in Figure 2 of your testimony, every one of those trips would be circuitously routed from A to D and then the stem miles to the area formerly serviced by C to determine savings?

APWU/USPS-T6-36. You testified (p. 9, line 5) that: “As a result (of Plant Consolidation), the Postal Service will be able to increase the capacity utilization of trucks that operate between plants.” Does this savings percentage account for current cube utilizations and circuitous routing?

APWU/USPS-T6-37. You testified (Page 15, line 3) that: “air transportation will increase by approximately 124 million pounds annually over current mail volumes transported by air.”

- a. What is the additional weight of mail containers associated with this extra mail volume?
- b. What is the current volume of mail transported by air?
- c. How does the cost of air transportation compare with ground transportation on a per pound basis?

Pursuant to the Presiding Officer’s Ruling Establishing Procedural Schedule, Ruling No. N2012-1/5 (issued January 12, 2012), the close of discovery on Postal Service direct case was February 24, 2012. On March 29, 2012, the Commission issued an updated procedural schedule for this docket. Order Concerning Scheduling of Updated Postal Service Testimony (Order No. 1301). This Order did not authorize the filing of any additional discovery on Postal Service witnesses beyond the February 24, 2012 deadline.

Each of the nine interrogatories set forth above was directed to Postal Service witness Martin (USPS-T-6). The interrogatories contain preambles that either directly quote witness Martin’s direct testimony (USPS-T-6), filed on December 5, 2012, or relate to issues discussed in her direct testimony. Having elected not to propound this discovery on or before February 24, APWU has offered no explanation for why it why it could not have submitted these interrogatories by that deadline or why it should now be permitted to unilaterally extend discovery on the Postal Service’s direct case beyond the period established by the Commission.

Accordingly, the Postal Service objects to these interrogatories.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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