

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

POST OFFICE STRUCTURE PLAN

Docket No. N2012-2

**RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS DAY
TO AMERICAN POSTAL WORKER UNION, AFL-CIO INTERROGATORIES
(APWU/USPS-T1-12—15)
(July 5, 2012)**

The United States Postal Service provides responses of witness Jeffrey Day to the above-identified interrogatories of the American Postal Worker Union, AFL-CIO (APWU), dated June 28, 2012. Each interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE
By its attorneys:

Anthony F. Alverno
Chief Counsel
Global Business & Service Development

Caroline R. Brownlie
Adriene M. Davis
James M. Mecone
Keith C. Nusbaum

475 L'Enfant Plaza, S.W.
Washington, D.C. 20260
(202) 268-6525; Fax -5402

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

APWU/USPS-T1-12.

Based on Figure 2 of your testimony, the Average Retail Hours per Week are well matched to the Average Earned Workload Hours per week for Levels 15 and 16 Post Offices. What is the purpose of including those offices in the plan?

RESPONSE

Please see the response to EM/USPS-28. As explained in that response, and as shown in Figure 7 on page 6 of the Direct Testimony of Jeffrey C. Day (USPS-T-1), a number of the EAS Level 15 and 16 Post Offices have an AEWL of 5.74 or less.

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

APWU/USPS-T1-13.

Based on your testimony at pages 10 and 13 there appears to be two reasons for an office to be upgraded from an EAS level 16 or below to an EAS Level 18 or above office. One way is for an office to have 5.74 hours of Adjusted Earned Workload and another is for an office to be upgraded because there is no other EAS Level 18 or above to serve as an APO for a particular cluster of post offices. Please confirm that upgrades presented in Figure 7 are all being undertaken due to the first reason.

RESPONSE

Confirmed that no Post Office identified as a Level 18 in Figure 7 is being upgraded solely so that Post Office may serve as an APO for a cluster of RMPOs (not to exceed 10 RMPOs per cluster). Please see page 13, footnote 10 of the Direct Testimony of Jeffrey C. Day on behalf of the United States Postal Service (USPS-T-1). Please note, however, that because Post Offices designated as PTPOs have additional responsibilities, the AEWL for those Post Offices accounts for the time associated with these responsibilities. See the responses to POIR No. 2, Question 8 and POIR No. 4, Question 3.

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

APWU/USPS-T1-14.

Library Reference USPS-LR-N2012-2/6 indicates that upgrading offices that are currently EAS Levels 15 and 16 offices to EAS Level 18 offices will cost the Postal Service approximately 10-20 percent more for essentially the same level of service. What is the rationale for that?

RESPONSE

Please see the response to EM/USPS-28. This interrogatory does not account for the EAS Level 15 and 16 Post Offices that will be classified as Level 4 or Level 6 RMPOs or PTPOs, per Figure 7 of the Direct Testimony of Jeffrey C. Day on behalf of the United States Postal Service (USPS-T-1). When taking into account all classification changes for EAS Level 15 and 16 Post Offices, Library Reference No. 6 (USPS-LR-N2012-2/6) indicates an estimated net savings of approximately \$48,000,000 for EAS Levels 15 and 16.

Further, the Post Offices identified in this interrogatory are not necessarily providing the same level of service once they are upgraded. For example, those Post Offices serving as APOs will have additional administrative responsibilities associated with their reporting RMPOs.

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

APWU/USPS-T1-15.

The timeline on page 22 of your testimony indicates that upgrades of Post Offices will be completed in June 2012. How many upgrades does the Postal Service anticipate will take place in the POStPlan offices by June 30, 2012?

RESPONSE

A partial objection to this interrogatory has been filed. As an initial matter, the referenced timeline on page 22 of the testimony states that “[t]he Postal Service will begin upgrading POStPlan Offices” in June 2012. The testimony does not support the interrogatory’s assertion that the upgrades will be completed in June 2012. As of June 30, 2012, the Postal Service has upgraded 951 Post Offices from EAS Level 16 or below to EAS Level 18 or above.