

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

POST OFFICE STRUCTURE PLAN

Docket No. N2012-2

**REVISED RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
QUESTION 3 OF PRESIDING OFFICER'S INFORMATION REQUEST NO. 3
[ERRATA]
(July 6, 2012)**

The United States Postal Service hereby gives notice of the filing of a revised response to the Postal Service's Response to Presiding Officer's Information Request No. 3, Question 3, dated June 21, 2012. The attached revised response supersedes the response filed on June 28, 2012. The question is stated verbatim and followed by the revised response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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3. In Library Reference No. 1 (USPS-LR-N2012-2/1), Column Q titled "PTPO Status" contains blank entries, as well as entries labeled "Cluster," "Isolated," "Cluster (upgraded to 18)," and "Isolated (upgraded to 18)."

- a. Please explain what each of these designations, including blank entries, represents.
- b. Please explain how each post office's corresponding "PTPO Status" was determined.
- c. Witness Day states, "As part of the POSTPlan, Postal Service officials will consider three criteria: the AEWL [Adjusted Earned Workload] of a Post Office, the distribution of RMPOs (clusters), and the distance between Post Offices." USPS-T-1 at 15, lines 11 through 13. Please explain how the distribution of clusters is used as a criterion as part of the POSTPlan.

RESPONSE

- a. Column Q (PTPO Status) indicates whether or not the identified Post Office is a PTPO. A blank indicates that the Post Office will not be classified as a PTPO. The term "Cluster" indicates that the Post Office will be classified as a PTPO because it is outside of a 25 mile radius of its potential APO. The term "Isolated" indicates that the Post Office will be classified as a PTPO because it is 25 or more driving miles from the nearest Post Office. Offices identified as "Cluster (upgraded to 18)," and "Isolated (upgraded to 18)" will be upgraded to EAS Level 18 Post Offices, and will not be PTPOs.
- b. Once a POSTPlan Office was determined to be eligible for a realignment of hours based on its AEWL (as explained on pages 11-16 of the Direct Testimony of Jeffrey C. Day on Behalf of the United States Postal Service (USPS-T-1)), the Postal Service analyzed the distance from the APO and the distance between Post Offices. The Postal Service first determined whether a POSTPlan Office was within a 25 mile radius of a potential APO. A Post Office identified in Library Reference 1 (USPS-LR-N2012-2/1) as "Cluster" or "Cluster (upgraded to 18)" is outside of the 25 mile radius of its potential APO. The Postal Service then

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determined that any Post Office that would otherwise be classified as an RMPO that was 25 or more driving miles from the nearest Post Office would be classified as a PTPO. These Post Offices are identified in Library Reference 1 (USPS-LR-N2012-2/1) as "Isolated" or "Isolated (upgraded to 18)."

Because PTPOs do not report to an APO and are thus responsible for administrative tasks instead of an APO, the administrative time otherwise excluded from an AEWL calculation under POSTPlan was added back in to calculate the AEWL for PTPOs. Post Offices that would otherwise be classified as PTPOs that have an AEWL (including administrative time) totaling more than 5.74 hours will be upgraded to EAS Level 18 Post Offices.

Please note that Postal Service headquarters is working with the field to finalize the status of POSTPlan Offices. Specifically, some offices have been identified as requiring redesignation from RMPO to PTPO or EAS Level 18 or above due to anomalies, such as limited seasonal ferry service, that impact the driving distance to the nearest Post Office. In addition, other PTPOs may be upgraded to EAS Level 18 or above when accounting for additional time worked that does not qualify as administrative time and is not otherwise captured in the variance calculations, such as time associated with assisting in mail delivery by plane at a local airstrip. As previously indicated, Postal Service headquarters is working with the field to finalize the new status of POSTPlan Offices and APOs, and the Postal Service will file an update to Library Reference No. 1 (USPS-LR-N2012-2/1) when the review process is complete.

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RESPONSE to Question 3 (continued)

- c. POStPlan limits the size of clusters to include no more than 10 RMPOs, i.e. no APO may supervise more than 10 RMPOs. If a proposed cluster were to include more than 10 RMPOs, the proposed cluster would be split and one of the RMPOs would be elevated to serve as an APO for the newly created cluster. This practice was not required for the initial distribution of POStPlan Offices as identified in Library Reference No. 1 (USPS-LR-N2012-2/1); however, the Postal Service may utilize this procedure, if required, during subsequent annual reviews.