

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

EVOLUTIONARY NETWORK DEVELOPMENT
SERVICE CHANGES, 2006

Docket No. N2006-1

NOTICE OF THE UNITED STATES POSTAL SERVICE
CONCERNING ERRATA TO REPLY IN OPPOSITION TO
AMERICAN POSTAL WORKERS UNION MOTION TO COMPEL RESPONSES
TO INTERROGATORY APWU/USPS-T1-9
(March 8, 2006) [ERRATA]

On March 7, 2006, the United States Postal Service filed a pleading bearing the following title:

REPLY OF UNITED STATES POSTAL SERVICE IN OPPOSITION TO
AMERICAN POSTAL WORKERS UNION MOTION TO COMPEL RESPONSES
TO INTERROGATORY APWU/USPS-T1-9

The first page of that document incorrectly identified the case caption and docket number of this proceeding. On page 6, it also incorrectly identified the *Government* Accountability Office as the *General* Accountability Office. Corrected copies of each page are attached.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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March 8, 2006

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UNITED STATES POSTAL SERVICE REPLY IN OPPOSITION TO
AMERICAN POSTAL WORKERS UNION MOTION TO COMPEL RESPONSES TO
INTERROGATORY APWU/USPS-T1-9
(March 7, 2006)

The United States Postal Service hereby responds to the February 28, 2006, motion of the American Postal Workers Union, AFL-CIO (hereinafter, APWU) seeking to compel the provision of data requested in the following interrogatory: APWU/USPS-T1-9. For the reasons explained below, the motion should be denied. Rather than repeat the arguments offered contemporaneously with its February 23, 2006, objection to this interrogatory, the Postal incorporates them by reference here.

For each of the at least 300 mail processing facilities identified in the Postal Service's February 22, 2006, response to DBP/USPS-14, APWU/USPS-T1-9 requests that the Postal Service provide data reflecting:

- (a) its square footage;
- (b) the number of floors on which mail processing operations occur;
- (c) the type of mail currently processed at each facility;
- (d) the type and number of mail processing equipment in use at each facility;
- (e) the mail processing complement by craft; and
- (f) the monthly average volume of mail processed by type for the most recent 12-month period.

and mail processing network analysis reflected in the Government Accountability Office audit report filed as USPS Library Reference N2006-1/7.

Later on page 20, APWU argues that “[i]t would be disservice for the Commission to permit the Postal Service to present its plans only in the form of abstractions.” In response, the Postal Service can only ask: What are policy objectives and the plans for achieving them but abstractions? The nature of the § 3661 review process is such that the Postal Service must submit statements of policy *objectives* and the operational *plans* for achieving them. Section 3661 proceedings are not retrospective in nature; they do not exist for the purpose of examining completed projects whose outcomes are known and can be judged in hindsight. If nothing else, Docket No. N89-1 serves as proof that the § 3661 review process is sufficiently well-suited for the review of such *abstractions* as are detailed in the materials filed in support of the instant request.

Finally, the Postal Service’s notes that its assertion of privilege in its February 23, 2006, objection to subpart (f) of this interrogatory arose from a concern that the data utilized by the END model that could be deemed as responsive to subpart (f) were mail *class-specific*, as opposed to workload data by operation and shape (letters/flats/parcels). The Postal Service maintains that it should not be re required to disclose such facility-specific workload data in response to this interrogatory for the reasons stated above, but wishes to clarify that commercial sensitivity is not at issue with respect to such data, as was first believed to have been the case.

In conclusion, for the reasons explained above, the Commission should deny the motion to compel a response to APWU/USPS-T1-9.