

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 INTERROGATORIES APWU/USPS-T2-1(a,f,g,h), 3(b), 6(k), and 8
(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 INTERROGATORIES APWU/USPS-T2-1(a,f,g,h), 3(b), 6(k), and 8

The first page of that document incorrectly identified the case caption and docket number of this proceeding. On page 3, n.2, 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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(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 answers to the following interrogatories: APWU/USPS-T2-1(a,f,g,h), 3(b), 6(k) and 8. For the reasons explained below, the motion should be denied.

APWU/USPS-T2-1

At issue in this proceeding is whether changes in the application of current service standard definitions to numerous 3-digit ZIP Code pairs -- that are expected to result from potentially nationwide operational changes implemented in pursuit of the Postal Service's Evolutionary Network Development (END) strategy -- would conform to the policies of the Postal Reorganization Act. As is clear from the testimony of witness Williams (USPS-T-2), the Postal Service plans to use outputs from its END model to assist in the development of proposals for the consolidation of mail processing and transportation operations at facilities throughout the mail processing network. Each local proposal then will be subjected to a centrally directed application of the Postal Service's Area Mail Processing (AMP) review procedures (USPS Library Reference N2006-1/3) for the purpose of determining its feasibility.

APWU/USPS-T2-1(a)

Subpart (a) of this interrogatory seeks to explore matters that are irrelevant and immaterial to the issues raised by the request in this proceeding. It is irrelevant to the issues raised by the request in this docket which facilities were among the 24 facilities for which AMP studies were initiated but put on hold, pending the development of the END model. It is equally irrelevant who within the Postal Service may have initially proposed that these facilities be subjected to review. Some of the 24 facilities subject studies that were put on hold during development of the END model are among the 10 facilities for which studies were ultimately completed, reviewed and approved in October 2005, and compiled in USPS Library Reference N2005-1/5. Some of the facilities are among those listed in the Attachment to USPS-T-2.¹

At page 10 of its motion to compel, APWU raises the shopworn canard that “[t]he fact that the Postal Service has taken the trouble to interpose objections to revealing such information bespeaks a desire not to reveal the full genesis of its Request.” To the contrary, the Postal Service has taken the trouble because the requested information is irrelevant and because the Postal Service hopes to be a constructive force in keeping the litigation of this docket focused on matters that are relevant and material to the issuance of an advisory opinion in response to its request.²

¹ And, since the entire mail processing network is potentially subject to AMP review as part of the Postal Service’s END strategy, it is safe to presume that the remainder of the facilities whose studies were put on hold will one day be queued up for new AMP studies.

² In the same vein at page 11, the APWU implies that the Postal Service is engaged in an effort to “deny the evolution” of its Network Integration & Alignment strategy to END. This is an odd accusation to make, given the Postal Service’s decision to accompany its request in this proceeding with a copy of the Government Accountability Office audit report that discusses the development that strategy. See USPS Library Reference N2006-1/7 at 53.