

of 456. Id. Use of the BPI, a hypothetical productivity, in this manner is totally incorrect. Not only does it use a productivity goal that may never be reached in place of reality, this use of BPI could result in a completely false positive outcome on the AMP study. The Olympia positive outcome on the Olympia/Tacoma pairing is thus apparently based not solely on the positive change that may be caused by the transfer of work, it is based on the productivity increased due to BPI – an outcome that would be expected without the transfer of work. The same problem is revealed in the paperwork on the Marysville/Sacramento pairing. USPS LR 1/5, page 000168. We do not know, because the footnotes have not been provided for all the studies, whether all the studies are thus afflicted; but we will proffer interrogatories on this subject.

The limited footnotes available to us also reveal that the Postal Service is using average weekly volumes in its AMP studies. The use of average volumes masks a very substantial problem of under-capacity. Daily volumes vary substantially (how much will be the subject of further discovery). The use of average weekly volumes may mask the fact that, on peak days, the gaining facilities may not be able to handle the volumes without using overtime or manual processing to meet service standards; or service standards may not be met on heavy volume days.

An example of this problem is provided by the Olympia/Tacoma pairing. Thus note 2 to the AMP report states, in part (at 000040):

...the THP of 599,352 did not reflect the actual volume that would be processed in 060. It was written up in the notes, but was not reflected on sheet 4a. The actual TPH volume for 060 should have been 2,928,963 pieces. Tacoma does not have the available

runtime on the AFSM 100 to process all of the Olympia 331 volume. The Olympia 331 TPH volume of 5,862,254 pieces. The distribution will be as follows:  
op 331 – 1,940,750pieces op 441 – 1,588,004 op 060 – 2,333,500

If you check the previous sheets, you will see that all of the 331 volume was not accounted for.

Operation 060 is the manual distribution of flat mail. Thus, the AMP report for the Olympia/Tacoma pairing apparently overlooks the fact, except in footnote 2, that one effect of this transfer of mail will be to cause a very substantial increase in the manual processing of flat mail in Tacoma. This raises serious questions of staffing levels, cost and service standards.

We suppose that the Postal Service will reply to this point that the fact that the AMP for Olympia/Tacoma makes this mistake is not of systemic significance and is thus beyond the scope of this proceeding. But from the data that is available, it seems that this problem is endemic. We can see that average mail piece handlings rather than actual daily piece handlings have been used to evaluate AMPs also in Santa Clara/Industry (page 000020); and the Bakersfield/Mojave pairing (page 000184). Thus, substantial discovery will be necessary on this point.