

Before the  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

Evolutionary Network Development )  
Service Changes, 2006 )

Docket No. N2006-1

OFFICE OF THE CONSUMER ADVOCATE  
INTERROGATORIES TO UNITED STATES POSTAL SERVICE  
WITNESS DAVID E. WILLIAMS (OCA/USPS-T2-4-6)  
March 21, 2006

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Pursuant to Rules 25 through 28 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA interrogatories OCA/USPS-1-5, dated March 3, 2006, are hereby incorporated by reference.

Respectfully submitted,

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OCA/USPS-T2-4. Please refer to USPS Library Reference N2006-1/8, "USPS Office of the Inspector General Audit Report – NO-AR-06-001," December 2005, at 8, observed that the AMP Guidelines do not "[f]ully address the criteria that are used to evaluate proposals and how the proposals are implemented." In Appendix D to the OIG Report, at 16, Letter dated December 1, 2005, from Paul Vogel, Vice President, Network Operations Management, and Thomas G. Day, Senior Vice President, Government Relations, in response to this criticism, VPs Vogel and Day write that the following criteria will be applied in AMP proposals:

To determine if implementation of an AMP is feasible, standardized data worksheets that evaluate the expected impacts are completed. These include worksheets that assess impacts such as:

- Impact 1: Costs and/or savings
- Impact 2: Annual work hours
- Impact 3: First-Class Mail service commitments
- Impact 4: Priority Mail service commitments
- Impact 5: Other mail class service commitments
- Impact 6: Domestic Mail Manual (DMM) labeling list changes
- Impact 7: Annual associated costs (maintenance, training, energy, space related costs, etc.)
- Impact 8: One-time associated costs
- Impact 9: Transportation
- Impact 10: Equipment relocation
- Impact 11: Remote encoding center (REC) operations

- Impact 12: The plans for space made available from the consolidation of operations.

Several of the standardized worksheets are included in Library Reference N2006-1/5, while others are not. Please explain why the following worksheets have been omitted from those provided for the 10 facilities included in LR-N2005-1/5.

a. “Other” mail class service commitments, specifically Express Mail, Periodicals, Standard Mail, and Package Service. For each of the LR-N2005-1/5 facilities, provide worksheets showing impact on Express Mail, Periodicals, Standard Mail, and Package Service.

b. DMM labeling list changes. Please provide these for each of the 10 facilities included in LR-N2005-1/5.

c. The plans for space made available from the consolidation of operations. Please provide these plans for each of the 10 facilities included in LR 5.

OCA/USPS-T2-5. Please refer to Library Reference N2006-1/8, “USPS Office of the Inspector General Audit Report – NO-AR-06-001,” December 2005, at 8, voiced concern that the AMP Guidelines “have not been updated since 1995. . . . Without clear guidance, the ability to implement AMPs with minimal disruption is affected and may cause inconsistencies in using the process. Further, without specific guidance, delays in the disposition of facilities and equipment could occur.”

a. Do you agree with the statements quoted above? If not, why not?

b. Please explain how the AMP guidelines were updated to address the OIG comments.

OCA/USPS-T2-6. Please refer to Library Reference N2006-1/8, "USPS Office of the Inspector General Audit Report – NO-AR-06-001," December 2005, at 11. The cited page contains a list of "lessons learned from previous consolidations." These are:

- Focusing on capturing savings and maintaining service.
- Developing proposed employee schedules early in the process.
- Using Microsoft project management software.
- Creating visual aids.
- Frequent meetings to facilitate communication.

Please explain in detail how you addressed each of these lessons in the current network redesign plan.