

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

EVOLUTIONARY NETWORK DEVELOPMENT  
SERVICE CHANGES, 2006

Docket No. N2006-1

RESPONSES OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE  
(OCA/USPS-23-26)  
(April 7, 2006)

The United States Postal Service hereby submits its responses to the following interrogatories of the Office of the Consumer Advocate, filed on March 23, 2006: OCA/USPS-23-26. The interrogatories are stated verbatim and followed by the responses.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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## **RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE**

**OCA/USPS-23.** On February 17, 2006, Wendy Brown of "The New Mexican," a Santa Fe, New Mexico newspaper, reported in an article (copy attached) that Mr. Paul Vogel, USPS Vice President for network-operations management in Washington, D.C., indicated during a conference call with reporters, on Thursday, February 16, that the Postal Service plans to test planned changes on Saturdays prior to consolidating facilities to insure that the changes work and mail is not delayed.

- a. Please confirm that the Postal Service tests changes prior to consolidating facilities to insure that the changes work and mail is not delayed. If you do not confirm, please explain.
- b. Has the Postal Service conducted Saturday testing for any of the 10 consolidations identified in USPS-LR-N2006-1/5?
- c. If your response to part b of this interrogatory is affirmative, please specifically identify each location where Saturday tests have been conducted.
- d. If your response to part b of this interrogatory is affirmative, please specifically identify each function that has been tested on Saturdays.
- e. If your response to part b of this interrogatory is other than affirmative, please explain for each of the locations why Saturday tests were not conducted.
- f. For each of the ten consolidations identified in USPS-LR-2006-1/5, did the tests indicate that any classes or sub-classes of mail may experience delivery delays? If so, please identify the classes and sub-classes, the locations that were identified, and describe the steps being taken to eliminate those delays.
- g. Please provide the anticipated schedule for performing Saturday tests in the future at the ten consolidations identified in USPS-LR-2006-1/5.

### **Postal Service to study U.S. mail facilities**

By WENDY BROWN | The New Mexican

February 17, 2006

The U.S. Postal Service plans to study mail facilities throughout the country and might shut down some, partially because people are sending less first-class mail.

Paul Vogel, Postal Service vice president for network-operations management in Washington, D.C., briefed reporters about the studies during a conference call Thursday.

Vogel said he knew of no studies in New Mexico, although a media advisory sent to The New Mexican on Wednesday said a study is taking place in "your community."

The Postal Service's media-relations headquarters referred a call about the conflicting information to James Coultriss, Postal Service spokesman for the Southwest. Coultriss did not return a phone call requesting comment.

Likewise, Margaret Romero, Postal Service spokeswoman in Albuquerque, did not return a phone call requesting comment.

According to Vogel, the Postal Service plans to study 50 mail-sorting facilities this year

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to determine if they should be consolidated with other facilities. They are located all over the country, although Arkansas and Texas are the only states in the area with facilities on the list. One study is planned in Arkansas and five are planned in Texas. In New Mexico, where the Postal Service has come under fire recently for late deliveries and missing mail, all mail is sorted at one processing plant in Albuquerque.

Vogel said the number of pieces of first-class mail has declined 20 percent over the past few years, and that is one of the main reasons for the studies. The popularity of e-mail has decreased the amount of paper mail that people send.

Population shifts and technological advances have also contributed to the need to streamline the postal system, Vogel said.

While it used to take employees one hour to sort 500 pieces of mail by hand, the Postal Service's bar-coding system can sort 30,000 pieces of mail in an hour, Vogel said.

The process of studying facilities, calculating results and reassigning employees could take nearly a year, Vogel said. The studies themselves should take up to 90 days.

Some facilities might close, while others would expand to pick up the difference, Vogel said. The Postal Service expects to reassign employees rather than lay them off.

When the Postal Service does consolidate facilities, officials plan to test the changes on Saturdays first to make sure they work and mail isn't delayed, Vogel said.

The Postal Service plans to make sure the public is involved, Vogel said. "We really believe we're a servant of the American public," he said.

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[http://www.freewmexican.com/story\\_print.php?storyid=39600](http://www.freewmexican.com/story_print.php?storyid=39600)

**RESPONSE to OCA/USPS-23**

- a. Not confirmed. The report is not entirely accurate. Mr. Vogel's reference was to past implementation of weekend AMPs, now referred to as Saturday AMPs. In such instances, originating operations in the service area of Plant A are consolidated on Saturdays only into Plant B. Mr. Vogel was attempting to make the general point that the Postal Service's experience with such AMPs gave him

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confidence that six-day consolidations would also prove to be operationally beneficial.

- b. Over the years, the Postal Service has conducted Saturday originating consolidations at a number of facilities, including the 10 referenced in the question. The objective was not to test the feasibility of a later six-day consolidations, but to realize the benefits of a Saturday originating consolidation.
- c. See the response to subpart (b).
- d. There were not tests. See the response to subpart (a). Saturday originating processing operations were consolidated into adjacent facilities.
- e. N/A
- f. There were not tests. See the response to subpart (a). No evidence of service delays emerged.
- g. As indicated above, Saturday consolidations were already performed.

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**OCA/USPS-24.** On February 17, 2006, Wendy Brown of "The New Mexican," a Santa Fe, New Mexico newspaper, reported in an article (copy attached to OCA/USPS-23) that Mr. Vogel, USPS Vice President for network-operations management in Washington, D.C., indicated during a conference call with reporters, on Thursday, February 16, that the Postal Service plans to make sure the public is involved when the Postal Service conducts studies to consolidate postal facilities.

- a. Please confirm that the Postal Service plans to involve the public in mail-sorting facility studies.
- b. Please explain how the Postal Service plans to involve the general public in mailsorting facility studies.

**RESPONSE**

- a. Confirmed, that words to that effect were uttered.
- b. Through a combination of public meetings and the solicitation of comments.

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**OCA/USPS-25.** The Postal Service's response to OCA/USPS-2 states:

The Postal Service has no plan for the direct solicitation of comments from the general public in relation to individual AMP studies. However, as comments from elected officials acting on behalf of the general public (and any unsolicited comments directly from the public) are received, those comments are to be forwarded to appropriate Headquarters personnel for consideration as they recommend final action on a relevant AMP proposal.

- a. Please confirm that the phrase in the last line, above, "as they recommend final action," means that timely comments received at headquarters will be considered before reaching a final decision. If you do not confirm, please explain.
- b. Please identify the position of the headquarters official that receives comments from elected officials, acting on behalf of the general public.
- c. Does the Postal Service provide a formal response to comments in relation to AMP studies received from elected officials acting on behalf of their constituents? If so, please explain the process for responding to comments from elected officials and please identify the office within the Postal Service and the Postal Service official responsible for responding to elected officials' comments. If no response is provided to elected officials, please explain why not.
- d. Does the Postal Service provide a formal response to unsolicited comments in relation to AMP studies received directly from the general public? If so, please explain the process for responding to comments from the general public and please identify the office within the Postal Service and the Postal Service official responsible for responding to unsolicited general public comments. If no response is provided to unsolicited comments made by the general public, please explain why not.
- e. Is it the Postal Service's policy that the appropriate channel for obtaining comments from the general public regarding local consolidations and closings of mail processing operations is limited to elected officials? If not, please explain the appropriate channel for obtaining comments from the general public regarding local consolidations and closings of mail processing operations.
- f. If your response to part e of this interrogatory is affirmative, how does the Postal Service communicate this policy to the general public that comments concerning consolidations and closings of mail processing operations should be forwarded to the appropriate elected officials? If this policy is not communicated to the general public, please explain why not.

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**RESPONSE to OCA/USPS-25**

- a. Confirmed.
- b. Correspondence directed to Postal Service headquarters from elected officials is directed to the appropriate Government Relations Manager. Government Relations managers respond as appropriate to comments regarding AMP studies from elected officials.
- c. It depends on whether they are expected. The overwhelming bulk of communication with elected officials has occurred in face-to-face meetings with those officials or designated members of their staff.
- d. No policy requiring a response to each comment is in place.
- e. To date, that has been the preferred, but not the only channel. In future, public meetings and the direct solicitation of public comment are planned.
- f. There has been no policy that public comments must be channeled through elected officials.

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**OCA/USPS-26.** Please confirm that in December 2005, the Postal Service announced plans to study possible consolidation of operations in Las Cruces, New Mexico and El Paso, Texas as indicated in the attached El Paso Times article of Sunday, March 12, 2006, discussing back-logs of standard-class mail and the hiring of temporary workers. The article is also available at web-site <http://www.borderlandnews.com/apps/pbcs.dll/article?AID=/20060312/NEWS/603120349>

- a. If you do confirm, please explain why that study is not one of the 41 AMP proposals listed in the Attachment to witness Williams' testimony which is described in his testimony at page 12 as, "A list of the studies currently underway...."
- b. If you do not confirm, please explain.

**Mail delivery outcry**

**Bulk-rate items arrive too late**

*Michael Hernandez*

*El Paso Times*

*Sunday, March 12, 2006*

Delays in El Paso's standard-class mail delivery service that are affecting some merchants have drawn scrutiny from the office of U.S. Rep. Silvestre Reyes and prompted the U.S. Postal Service to hire temporary workers.

Though Postal Service officials say a nationwide spike in service has yielded a backlog of only bulk-rate mail in El Paso, several employees of the city's main post office said the delays are due to a startling shortage of staff and are also affecting some second-class mail service.

"We've had mail piled up to the rafters," postal worker Frank Chavez said about the backlogs of mail service at the Postal Service main distribution plant at 8401 Boeing. "They're trying to catch up, but that means that they are working these people to death." Chavez said he has found stacks of advertising mail sitting up to 12 days to be processed. He and other workers at the main distribution plant said the Postal Service has done little to fill the vacancies that employment attrition has created in El Paso. Further, they said, the impact of the vacancies has been magnified by an increase in the Las Cruces mail being processed.

"What we are processing is up about 50 percent since we started doing the (mail) from Las Cruces," Chavez said. "Our management knew since last March that we were already short-staffed, but they have not really hired enough people to do all that additional work."

The Postal Service plans to bring on between 10 and 15 temporary workers in El Paso by next week to help alleviate delays in mail service, said Peter Brock, a spokesman for Reyes' office.

The Postal Service in El Paso "has made a self-declaration of the delays. They have to

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do that to hire temporary workers," Brock said. "We've been told that they will keep the (temporary workers) on staff until things are clear."

El Paso Postmaster Felix Guerra could not be reached for comment about the scope of the delays and whom it has affected.

But Jim Coultriss, a spokesman for the Postal Service who is based in San Antonio, insists the problems have not reached first-class mail or Express Mail.

So far, the delays have concerned local and national merchants who count on the standard-class mail service for advertising, Coultriss said.

Dan McMahon, a manager at retail store Stein Mart, 7401 N. Mesa, said he has taken a couple of calls from consumers inquiring about a sale for which they received notification after it was over.

Coultriss said the Postal Service has had an increase in standard-class mail service since it raised rates in January. He added that El Paso processes only weekend mail from Las Cruces.

But postal employees at El Paso's main distribution plant said they are taking on more than weekend mail from Las Cruces.

"We're severely understaffed, and this is where all the mail comes in to go to the rest of the stations," said Manuel Renteria, who sorts mail. "Right now, people are jumping out of their seats to fix the problem, but what happens later on?"

Renteria added that employees have been required to work upwards of 10 hours for six and seven days each week to handle the backlog of mail. "There's a lot of stress on the floor."

Brock said Congressman Reyes will continue to monitor the issue.

In December 2005, the Postal Service announced plans to study whether to consolidate mail operations in Las Cruces and El Paso. Postal Service officials said the study, which will take 90 to 120 days, was not related to complaints by some Las Cruces residents that mail was routinely delayed for weeks.

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The Associated Press contributed to this story.

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**RESPONSE to OCA/USPS-26**

- a. Confirmed. The Las Cruces, NM AMP feasibility study has been placed on hold while operational issues unrelated to END are being addressed.
- b. N/A