

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

EVOLUTIONARY NETWORK DEVELOPMENT  
SERVICE CHANGES, 2006

Docket No. N2006-1

REVISED RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS WILLIAMS  
TO APWU INTERROGATORY APWU/USPS-T2-6 [ERRATA]  
(April 18, 2006)

The United States Postal Service hereby submits the revised response of witness Williams to the following interrogatory of the American Postal Workers Union, AFL-CIO: APWU/USPS-T2-6. Responses to subparts (a) through (d) were filed on February 27, 2006. An objection to subpart (k) was filed on March 8, 2006. The February 27<sup>th</sup> partial answer indicated that information responsive to the remaining subparts was forthcoming. The revised answer today supersedes the original partial response by including the original answers to subparts (a) through (d) as well as the promised answers to subparts (e) through (j), (l) and (m).

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux  
Chief Counsel, Ratemaking

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Michael T. Tidwell

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2998; Fax -5402  
michael.t.tidwell@usps.gov

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS WILLIAMS  
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**APWU/USPS-T2-6**

Using the Pasadena P&DC AMP from Library Reference N2006-1/5, please provide the following information:

- a) Is it correct to understand from Worksheet 2 that some of the work of the Pasadena P&DC is being split and consolidated into two other existing facilities the Santa Clarita P&DC and the Industry P&DC? If this is incorrect, please explain why.
- b) Is it correct that only outgoing operations are being consolidated? Is it correct that some outgoing operations will be maintained at the Pasadena P&DC (Express, PARS intercept, Platform, and Registry)? If this is incorrect, please explain why.
- c) Describe what impact the change in outgoing operations will have on incoming operations.
- d) How is the mileage on Worksheet 2 determined? Is that the mileage of a standard transportation run between the existing facilities or a straight line measurement?
- e) On Worksheet 2 is it correct to assume that the numbers under Personnel is measured as the number of employees? Is that an estimate of employees that will no longer be required to accomplish this work or the number of employees to be transferred to the other two facilities? If this is incorrect, please explain why.
- f) On Worksheet 2, what is the unit of measure under the Service heading?
- g) On Worksheet 4, the annual numbers appear to be calculated from 2004 MODS operations data. Is that correct?
- h) What assumption is made about relative productivity between the proposal facility and the gaining facility when determining the hours transfers from one to the other?
- i) On Worksheet 6, how are the proposed workhours determined? How is the proposed annual cost determined?
- j) What is the source of the data used in Worksheet 7?
- k) Why are the First Class mail statistics on Worksheet 7 being redacted?
- l) Please describe how the numbers on the Transportation Savings/Cost worksheet are calculated.
- m) Please describe how each line of Worksheet 10 is calculated and the data that are used to determine the numbers.

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**RESPONSE to APWU/USPS-T2-6:**

- (a) Confirmed.
- (b) All originating mail for the Pasadena, CA P&DC is being consolidated.
- (c) Mail from the Pasadena origin area which destines in Pasadena will receive primary sortation at the Santa Clarita P&DC and the Industry P&DC, and returned to Pasadena for secondary handling.
- (d) The former.
- (e) Correct.
- (f) Average Daily Volume in Pieces
- (g) Correct.
- (h) None.
- (i) 1840 workhours/year
- (j) Origin-Destination Information System volume data.
- (k) Objection filed.
- (l) Contract Bid Cost in Dollars.
- (m) Management at the local level (in most cases, the maintenance manager) evaluates the impacts on maintenance support requirements cost when equipment is removed from the plant and on the expected use on the equipment which remains. In the case of the Pasadena AMP, 11 pieces of processing equipment was removed. The manager determines the

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**RESPONSE to APWU/USPS-T2-6 (continued):**

impact on maintenance routes, training, etc., that will no longer be required, then quantifies the saving to the Worksheet 10 lines for the specific equipment types such as automated, mechanized, and other (material handling equipment). In addition, an estimate is made for saving on electricity requirements from less equipment and from the decrease in energy related to reduced operations.