

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

**Evolutionary Network Development
Service Changes, 2006**

Docket No. N2006-1

**INTERROGATORIES OF AMERICAN POSTAL WORKERS UNION, AFL-CIO TO
USPS WITNESS WILLIAMS (APWU/USPS T2-52-57)
(April 21, 2006)**

Pursuant to Rules 25, 26, and 27 of the Rules of Practice, The American Postal Workers Union, AFL-CIO directs the following interrogatories to USPS witness David E. Williams. If the witness is unable to respond to any interrogatory, APWU requests that a response be provided by an appropriate person capable of providing an answer.

Respectfully submitted,

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APWU/USPS-T2-52 In your response to APWU/USPS-T2-40 you indicated that you do not analyze whether bulk mailers must make changes in their drops as part of the AMP study. However, you did not answer the general question that was posed. Please provide an answer to the general question. Do bulk mailers dropping mail at plants losing originating mail processing receive the same level of discounts as they did when those plants had outgoing primary operations? If they do not, must they take their mail to the AMPC facility to qualify for the same level of discount or is there some other option? If there is some other option, please identify it.

APWU/USPS-T2-53 In your response to APWU/USPS-T2-34 you state that “density analysis reports are not provided as part of the AMP study documentation.”

- a) Does this mean that density analysis reports are not used or evaluated in the AMP analysis?
- b) If they are used, how are they used?
- c) If they are not used, why not?
- d) Please provide for each of the ten consolidated facilities presented in N2006-1/5, using whatever means necessary, the percentage of originating mail being sent to the AMPC facility that would return as destinating mail to each of the consolidated offices.

APWU/USPS-T2-54 In your description of the AMP process, there is no mention of AMP revisions or different versions of a specific AMP.

- a) In the AMP process, are AMP reports revised? If so, at what point in the process may revisions occur and, by position, who has the authority to make revisions?
- b) Under what circumstances might an AMP report be revised?
- c) Please describe the process that would take place for such a revision.
- d) Did any of the AMPs identified in Library Reference N2006-1/5 have more than one version? If so please identify which ones.

APWU/USPS-T2-55 To clarify your response to APWU/USPS-T2-6:

- a) Your response to (c) fails to provide a description of the impacts. Will the destinating mail be available at the same time it otherwise would have been available to be sorted? If not, by how much will the window have changed? Please describe any other changes that will take place.
- b) Your response to (e) fails to answer the final two questions in the section. Please provide an explanation as to where the employees tabulated on Worksheet 2 will work after this change takes place. Will it be the AMPC facility or will they be moved to other facilities?
- c) Your response to (h) does not provide an answer as how the number of hours needed to process the transferred mail is calculated. Please provide a complete explanation and indicate if this is a consistent method of calculating these hours whenever calculations for this worksheet are completed.
- d) Your response to (i) makes no sense. Please provide a complete explanation as to how these numbers are calculated. If necessary, please provide a worksheet showing the calculations for the Pasadena AMP.
- e) Your response to (l) is less than clear. Please explain “contract bid cost in dollars.” Is it an average of current contract bids for similar routes, or the average of current national contract bids, or are the Transportation Savings/Cost data based on specific real costs calculated by new contract bids or contract solicitations for specific routes or are they calculated some other measure?
- f) While your response to (m) provides a helpful overview about the calculations it does not provide the requested description for each line, the inputs needed for the calculations, and how the maintenance manager calculates those costs. Please provide this information.

APWU/USPS-T2-56 To clarify your response the APWU/USPS-T2-25 (h) does this mean that mail picked up at collection boxes within the 077 area will go to Kilmer and mail picked up at collection boxes within the 087 area will go to Trenton? What about mail that was originally deposited at the Monmouth facility?

APWU/USPS-T2-57 Please provide the complete AMP documentation for any of the 41 AMPs on your list that have been approved since the case was filed.