

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

EVOLUTIONARY NETWORK DEVELOPMENT
SERVICE CHANGES, 2006

Docket No. N2006-1

RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS WILLIAMS
TO APWU INTERROGATORIES APWU/USPS-T2-47 AND 48
(April 25, 2006)

The United States Postal Service hereby submits the response of witness Williams to the following interrogatories of the American Postal Workers Union, AFL-CIO, filed on March 23, 2006: APWU/USPS-T2-47 and 48.

The interrogatories are stated verbatim and followed by the responses.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux
Chief Counsel, Ratemaking

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 WILLIAMS TO
INTERROGATORY OF THE AMERICAN POSTAL WORKERS UNION**

APWU/USPS-T2-47

Following up on your response to APWU/USPS-T2-6 (b), on page 000020 of N2006-1/5 the following statement is made "outgoing operations that will remain are Express, PARS intercept, Platform, and Registry." Are these operations all considered to be distinct from Pasadena originating mail? In particular how are Express and registry mail handled after this consolidation?

RESPONSE

Currently the facility is still processing Outgoing Express for the all of the 910-912 service area along with 914, 915, 916 and parts of 913. For Registry operations, each pouch is off-loaded at the dock. The Registry Section receives, accounts for, and then dispatches the registered pouches to the receiving plant. Each item is still accounted for and is kept in the Pasadena records. The actual outgoing sort operation is no longer completed.

The PARS operation was removed on November 7, 2005.

There is no outgoing sort on the remaining platform operations.

**RESPONSE OF UNITED STATES POSTAL SERVICE WILLIAMS TO
INTERROGATORY OF THE AMERICAN POSTAL WORKERS UNION**

APWU/USPS-T2-48

On page 000184 of N2006-1/5, the following statement is made, "Mojave has already attritted the positions identified in the savings." If these positions were not current positions when the AMP was filed how can they be considered savings when the AMP is approved?

RESPONSE:

The annotation referenced was misstated. Pacific Area management will modify the worksheet to reflect the on rolls complement and provide a comparison with wording that reflects what was proposed. The evaluation will occur during the first Post-Implementation Review.