

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-T2-53 THROUGH 57  
(May 8, 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 April 21, 2006: APWU/USPS-T2-53 through 57.

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 UNITED STATES POSTAL SERVICE WITNESS WILLIAMS TO INTERROGATORIES OF THE AMERICAN POSTAL WORKERS UNION

**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.

### RESPONSE

- (a) Density Analysis reports are not necessary for the completion on the AMP worksheets.
- (b) N/A
- (c) See the response to subpart (a).
- (d) Determination of the percent of originating mail returned to the AMPed site is not part of the AMP process. The Postal Service routinely published national quarterly aggregate inter-P&DC mail volume percentages for mail classes measured by the Origin-Destination Information System. For purposes of a proceeding focused on the questions of nationwide scope, these national aggregate inter-P&DC turn-around mail volume estimates would seem to serve as a reasonable proxy for the percentages for any given locality. Inter-P&DC data are published at Table 5 of each public ODIS Quarterly Statistics Report. The report for FY 2006 Q1 is available at:

[http://www.usps.com/financials/qsr/Quarter\\_1\\_FY06.pdf](http://www.usps.com/financials/qsr/Quarter_1_FY06.pdf)

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**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.

**RESPONSE**

(a-d) Please refer to the response to OCA/USPS-T2-8.

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**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.

### **RESPONSE**

- (a) The Pasadena destinating mail from the Pasadena origin area will be available to meet the AMPC facility operating plan Critical Entry Time and Clearance Time.
- (b) Clerk Impact: I am informed that, initially, local management advised the Area level of the APWU that a total of 58 full-time clerks, less any attrition, would be excessed from the Pasadena installation to the clerk craft at the site receiving the mail and to withhold jobs in other offices within 100 miles.

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**RESPONSE to APWU/USPS-T1-55 (continued)**

A total of 16 full-time clerks were ultimately excessed. I am informed that the difference in the number was based on the following:

1. Attrition
2. Staffing/bid shortfalls in the Pasadena stations
3. A decision to move AADC processing to the Pasadena plant

Senior non-impacted clerks elected to go in lieu of the junior clerks identified to be excessed. 12 were placed in available withheld assignments in post offices that were closer to their residences and 4 went to the Santa Clarita (Van Nuys) P&DC, the principal receiving site for the mail.

Maintenance Impacts: Three maintenance staff were excessed, two Electronic Technicians and one maintenance support clerk. The maintenance craft employees went to withheld assignments at the Santa Clarita (Van Nuys) plant, which was the main receiving site for the mail.

Although two Mail Processing Equipment Mechanics were initially identified to be excessed from the Pasadena plant, the advent of one vacancy and a voluntary reassignment eliminated the need to take such action.

- (c) Annual TPH volumes by operation for operations, including the by the volume which will be moved, are listed in the workhour column for the AMPC facility. Workhour productivity for the AMPC facility is applied to the projected volume.
- (d) My response does make sense. 1840 is the number of workhours per year used for each position calculation. The annual cost indicates the cost for each position type (times the number of positions).

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**RESPONSE to APWU/USPS-T1-55 (continued)**

- (e) The Transportation Savings/Cost data is based on specific real costs calculated by proposed new contract bids or contract solicitations for specific routes.
- (f) This worksheet evaluates the AMP plan's total annual associated cost not listed on any other worksheet. This form is primarily used in conjunction with new facilities, but may also be used to justify other costs when appropriate. This worksheet, however, must be completed for all AMPs. 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 were removed.

The manager determines the impact on maintenance routes, training, etc., that will no longer be required, then, using the USPS Financial Performance Report - FPR Line Report - as a reference to the history of specific line item expenses, 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

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**RESPONSE to APWU/USPS-T1-55 (continued)**

energy related to reduced operations using FPR line item historical data as  
a reference.

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**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?

**RESPONSE**

Yes. The Monmouth facility was in the 077 service area.

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**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.

**RESPONSE**

It is assumed that the question seeks copies of the decisions packages in the format reflected in USPS Library Reference N2006-1/5. As they are finalized, the next 10 will be compiled in Library Reference N2006-1/10.