

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 INTERROGATORIES OF THE AMERICAN POSTAL WORKERS UNION  
(APWU/USPS-T2-79 THROUGH 83)  
(June 6, 2006)

The United States Postal Service hereby submits the responses of witness Williams to the following interrogatories of the American Postal Workers Union, filed on May 22, 2006: APWU/USPS-T2-79 through 83. Each interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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

**APWU/USPS-T2-79** In Library Reference N2006-1/3, the Post Implementation Review process is described as having the appropriate management personnel fill out the same worksheets that are filled out for the AMP process, skipping worksheets 3 and 8.

- a) Where in this process does the Postal Service assess whether the service standards expected at the time of the consolidation are actually being met?
- b) Why are managers directed not to fill out Worksheet 8, which seems to be asking about the impact on service commitments for mail classes other than First Class mail?
- c) Is there a requirement in this process that management personnel assess whether the service standards set for First Class mail are actually being met after the consolidation takes place?
- d) If so, what data are used to make that assessment and where is it reported in the PIR?
- e) If not, why is such an assessment not required?
- f) Where in the PIR process are capacity constraints or bottlenecks at the gaining plant listed and assessed?
- g) Where in the PIR process are impacts on carrier dispatch times in ZIP codes whose originating mail has been moved listed and the service impacts assessed?
- h) Where in the PIR process are actual transportation bottlenecks or changes in pick-up and delivery schedules reported and assessed?
- i) Where in the PIR process are problems reported by customers after the consolidation reported and assessed?

**RESPONSE:**

- (a) The evaluation of service performance to goal is a routine management function independent of whether a consolidation has recently been implemented in a particular service area.
- (b) Downgrades to service standards for classes of mail other than First-Class Mail and Priority Mail should be indicated at the top of Worksheet 8.
- (c) See the response to subpart (a).
- (d) N/A
- (e) See the response to subpart (a).
- (f) Worksheet 4 provides an evaluation of proposed workhour usage vs. actual.

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**RESPONSE TO APWU/USPS-T2-79 (continued):**

Routine monitoring and diagnosis of mail processing and transportation operations occurs irrespective of whether a consolidation has recently been implemented in a particular service area. One would expect such monitoring and diagnosis to identify and address such issues.

(g) The evaluation of carrier units is a routine, ongoing management function that is not prompted by whether an area has recently been subjected to an AMP. It is not part of PIR process.

(h) Worksheet 9 should reflect an evaluation of proposed transportation usage vs. actual. Routine monitoring and diagnosis of mail processing and transportation operations occurs irrespective of whether a consolidation has recently been implemented in a particular service area. One would expect such monitoring and diagnosis to identify and address such issues.

(i) Customer communication avenues are the same after the AMP implementation as they were prior to the study. The Postal Service does not segregate customer expressions of concern about service on the basis of whether they could be related to a recently implemented consolidation.

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**APWU/USPS-T2-80** In your response to VP/USPS-T2-6, you state “the Postal Service will be able in the future to monitor originating and destinating service performance scores for Performance Clusters covered by EXFC, as well as ODIS time-in-transit data for all 3-digit ZIP Code pairs, irrespective of whether Performance Clusters or 3-digit ZIP Code pairs were the subject of a consolidation decision.”

- a) Is there any requirement, as part of the AMP review process that a comparison be made of EXFC and ODIS time-in-transit performance measures of consolidated ZIP code mail before and after consolidation? If so, please describe that requirement and how it is reported to the management team that is assessing the success of individual AMPs.
- b) Do these only apply to First Class mail? If not, what other classes of mail can be assessed through this process?
- c) Please describe ODIS time-in-transit data including mail classes covered.

**RESPONSE**

- a) No.
- b) Since EXFC is the only mail class also measured by ODIS, EXFC/ODIS review would only apply to First-Class Mail.
- (c) I am informed that ODIS generates 3-digit to 3-digit ZIP Code area time-in-transit data for First-Class Mail, Priority Mail and Package Services.

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**APWU/USPS-T2-81** As part of the assessment of the AMPs listed in Library Reference N2006-1/11, has an assessment been made of changes in the EXFC scores for those areas that were impacted by those consolidations? If so, what were the findings?

**RESPONSE**

Site specific assessments of EXFC scores for AMP implementations are not a part of the AMP process. See the response to APWU/USPS-T2-79(a).

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**APWU/USPS-T2-82** Will your team, as part of its assessment of the success of the AMP process within the END framework, compare the scores generated by any of the above mentioned performance monitoring procedures for the impacted ZIP codes of your test AMPs (listed in LR N2006-1/5)? If so, what sort of an assessment will you make and when? If not, why not?

**RESPONSE**

The evaluation of service performance to goal is an on going effort and includes ZIP Codes associated with already implemented AMPs. Site specific assessments are not routinely made at the national level as a part of the AMP process.

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**APWU/USPS-T2-83** In your response to VP/USPS-T2-3, you state that consolidations do not diminish the ROI for equipment formerly used for outgoing operations because the “excess equipment at consolidated facilities will be relocated to where it can be better utilized.” Where in the review process for AMPs is there an assessment as to whether the equipment is being better utilized? Please describe the data and comparisons used in this assessment.

**RESPONSE**

The assessment of equipment asset optimization for excess processing equipment is done at the area level and is separate from the AMP process.