

Before the
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

Evolutionary Network Development)
Service Changes, 2006)

Docket No. N2006-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS DAVID E. WILLIAMS (OCA/USPS-T2-19-22)
June 13, 2006

Pursuant to Rules 25 through 28 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA interrogatories OCA/USPS-1-5, dated March 3, 2006, are hereby incorporated by reference.

Respectfully submitted,

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Officer of the Commission

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OCA/USPS-T2-19. Please refer to your response to OCA/USPS-T2-4(c) which stated, “An analysis sheet was developed to evaluate space made available from operations consolidation after the evaluation of the 10 facilities included in USPS Library Reference N2006-1/5 were completed.”

- a. Please provide a copy of that analysis sheet.
- b. Has that analysis sheet been used for any AMP studies? If so, please list the AMP studies where it has been used.
- c. If the analysis sheet has been used, please provide a copy of one of the completed analysis sheets, if one has not already been submitted in this proceeding.

OCA/USPS-T2-20. Please refer to your response to OCA/USPS-T2-5 in which you expressed agreement with the OIG Report of December 2005 voicing concern that “Without clear guidance, the ability to implement AMPs with minimal disruption is affected and may cause inconsistencies in using the process.”

- a. Do you believe that in order to avoid inconsistencies in the AMP process there should be decision rules that would provide guidance as to when a proposed consolidation should be rejected due to adverse impact on the service standards for 3-digit ZIP Codes? If not, please explain the reasons for your answer.
- b. Do you believe that in order to avoid inconsistencies in the AMP process there should be decision rules that would provide guidance as to when a proposed consolidation should be rejected due to the volume of mail for which service

standards for 3-digit ZIP Codes would be downgraded? If not, please explain the reasons for your answer.

- c. Do you believe that in order to avoid inconsistencies in the AMP process there should be decision rules that would provide guidance when a proposed consolidation should be rejected due to a certain level of adverse impact on collection box pick-up times in the area of the losing facility? If not, please explain the reasons for your answer.
- d. Do you believe that in order to avoid inconsistencies in the AMP process there should be decision rules that would provide guidance when a proposed consolidation should be rejected because the first year savings do not meet a certain level of savings or save a certain percentage of operations costs?
- e. Are there any decision rules, such as those cited in part a-d above, or others which are applied by the Postal Service to the AMP studies?
- f. Do you know of any decision rules applied by the Postal Service during the AMP process that, if applied, would be sufficient to reject the proposal. If so, please state the decision rules and/or provide a reference to those decision rules in Postal Service documents.

OCA/USPS-T2-21. Please refer to your response to OCA/USPS-T2-9 indicating “For the six AMPs approved in 2004, there were ten (10) 3-digit upgrades and sixteen (16) 3-digit pair downgrades.”

- a. Please confirm that the six AMPs approved in 2004 referred to in your response are contained in LR-L-N2006-1/11. If not, please explain.

- b. Please list the upgrades and downgrades for the six AMPs approved in 2004, by ZIP Code, service commitment before and after consolidation, and the volume of mail involved with each change in service commitment.

OCA/USPS-T2-22. Please refer to your response to OCA/USPS-T2-11 in which you indicate that you do not have any follow-on data for those AMP PIRS where only service (but not efficiency) could be improved.

- a. Please list the AMPs which have been approved and those AMPs which have been approved and implemented in which “only service (but not efficiency)” was expected to be improved in the AMP study
- b. Please list the 28 AMPs implemented since 1995 referenced in your response to OCA/USPS-T-11(b).
- c. Please confirm that the 28 AMPs implemented since 1995 do not include any of the 11 AMPs included in either LR-L-2006-1/5 or 6.
- d. Have any AMPs been implemented since the response to OCA/USPS-T2-11(b) was filed? If so, please list.