

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

Evolutionary Network Development
Service Changes, 2006

Docket No. N2006-1

**MOTION OF AMERICAN POSTAL WORKERS UNION, AFL-CD,
TO COMPEL THE UNITED STATES POSTAL SERVICE
TO PRODUCE ALL COMPLETED
AREA MAIL PROCESSING DECISION PACKAGES
(June 30, 2006)**

The American Postal Workers Union, AFL-CIO (APWU), hereby respectfully moves the Postal Rate Commission to compel the United States Postal Service to produce all completed Area Mail Processing Decision Packages.

U.S. Postal Service witness David Williams stated in his testimony

Area managers notified Headquarters of their intention to begin 46 AMP feasibility studies, with plans to submit the completed AMP proposals for review and approval by Headquarters in early 2006. A list of the studies currently underway is attached to my testimony.¹

On May 31, 2006, the APWU filed Interrogatory APWU/USPS-T2-84 seeking the “complete AMP documentation on all AMPs from that list where a decision has been reached,” including those where the decision has been to not move forward with the consolidation. In its response, filed on June 23, 2006, the Postal Service indicated that a decision had been made for only one AMP on the list for which a

¹ USPS-T2, page 11-12.

study was completed.² The Postal Service further stated that it would soon file the redacted and unredacted copies of the decision package for this study as a Library Reference.³

However, by letter dated May 22, 2006, the Postal Service informed the APWU that AMP feasibility studies had been completed for five locations contained in the list of 46 facilities to be studied.⁴ These studies include: Utica, NY P&DF into Syracuse, NY P&DC; Plattsburgh, NY Post Office into Albany, NY P&DC; Burlington, VT P&DF into White River Jct., VT P&DC; Springfield, MA P&DC into Hartford, CT P&DC; and Portsmouth, NH P&DF into Manchester, NH P&DC. The letter also states that the Postal Service determined “after careful and exhaustive review... that there are currently no significant opportunities to improve efficiency or service through consolidation of mail processing operations at the locations listed above.”⁵ Given the substantial role AMP feasibility studies play in the Postal Service’s END initiative, the Postal Rate Commission must compel the Postal Service to produce the AMP decision packages for all completed studies, including the five studies cited above.

These studies are of intrinsic value to the Commission and the participants in this case. To date, the Postal Service has filed AMP decision packages on 17 AMP feasibility studies, none of which were included on the list of studies provided by USPS witness Williams. Moreover, the Postal Service has acknowledged that

² USPS Response APWU/USPS-T2-84.

³ Id.

⁴ See Attachment 1, Letter to APWU President William Burrus, May 22, 2006 from USPS.

⁵ Id.

these 17 AMPs are not representative of proposals and results expected when the process is rolled out nationwide.⁶

Now the Postal Service has begun the nationwide rollout of its END initiative, beginning with the initiation of AMP studies on the 46 facilities identified by Postal Service witness Williams.⁷ The Postal Service has not and cannot argue against the obvious relevance of these studies. In fact, in response to Interrogatory APWU/USPS-T2-57, Postal Service witness Williams stated “[a]s they [the AMPs listed in attachment to his testimony] are finalized, the next 10 will be compiled in Library Reference N2006-1/10.”⁸ To date, the Postal Service has filed no additional AMP decision packages.

Examination of AMP studies, including those where the Postal Service ultimately decided to forgo consolidation, is vital to accurate assessment of the END program by the Commission. Such an examination enables the participants in this case and the Commission alike to better understand the decision making process; particularly the evaluation of factors that contribute to the decision to proceed with a particular consolidation or not. Therefore, any studies of these facilities presently completed are highly relevant to an understanding of the AMP process and how this process is utilized to further the goals of END.

The APWU is simply asking the Commission to hold the Postal Service to its word and order it to produce all completed AMP study decision packages. The

⁶ USPS-T-2 at 14; see also United States Postal Service Reply in Opposition to APWU Motion to Compel Response to Interrogatories APWU/USPS-T2-1(a,f,g,h), 3(b), 6(k) and 8, March 7, 2006.

⁷ USPS-T-2 Attachment.

⁸ Response to APWU/USPS-T2-57, May 8, 2006.

APWU further requests that the Commission make this a standing obligation and order the Postal Service to provide the decision packages for AMP studies as they are completed.

For the foregoing reasons, the APWU respectfully requests that the Commission grant this Motion to Compel and enter a standing order requiring the Postal Service to produce the AMP decision packages for all completed AMP studies.

Respectfully submitted,

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LABOR RELATIONS



May 22, 2006

Mr. William Burrus
President
American Postal Workers
Union, AFL-CIO
1300 L Street, NW
Washington, DC 20005-4128

FAX 202-842-4285
Certified Mail Number
7005 1160 0001 5015 9988

RE: Area Mail Processing (AMP) Study Completion

Dear Bill:

On November 16, 2005, you were notified of the U. S. Postal Service's intent to conduct Area Mail Processing (AMP) studies for the feasibility of consolidating certain mail processing operations at the following locations in the Northeast Area:

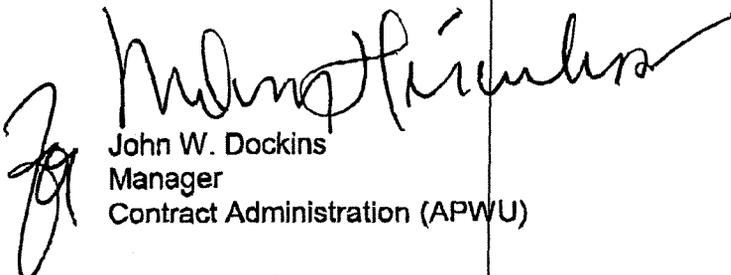
- Utica, NY P&DF into Syracuse, NY P&DC
- Plattsburgh, NY Post Office into Albany, NY P&DC
- Burlington, VT P&DF into White River Jct., VT P&DC
- Springfield, MA P&DC into Hartford, CT P&DC
- Portsmouth, NH P&DF into Manchester, NH P&DC

This letter is to notify you that those studies have now been completed.

After careful and exhaustive review, it has been determined that there are currently no significant opportunities to improve efficiency or service through consolidation of mail processing operations at the locations listed above. Therefore, no significant changes will be made at this time.

If you have any questions concerning these AMPs, please contact Mary Hércules, at (202) 268-4356.

Sincerely,



John W. Dockins
Manager
Contract Administration (APWU)