

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-T2-99 THROUGH 112)
(July 7, 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 June 16, 2006: APWU/USPS-T2-99 through 112.

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
INTERROGATORY OF THE AMERICAN POSTAL WORKERS UNION**

APWU/USPS-T2-99

- a) Please provide a description and documentation of the steps the Postal Service took to collect public input related to the Newark AMP.
- b) Please provide a description of any input that was received and what the Postal Service's response was to that input.

RESPONSE

a-b) The Area Mail Processing Communications Plan (LR 1/4) was followed for purposes of issuing notice of intent to conduct the AMP feasibility study and for announcing the final agency decision. The Newark AMP study was completed before the Postal Service adopted its AMP Public Input Process. I am not aware of any specific input from the public regarding the Newark AMP.

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APWU/USPS-T2-100 Please provide a copy of the notes that the Postal Service took during the town hall meetings on the Sioux City and Rockford AMPs. Please provide any list of action items resulting from those two town hall meetings.

RESPONSE

The commitment to conduct both of these meetings preceded the establishment of that Public Input Process. These meetings were not conducted as part of the subsequently developed Public Input Process reflected in USPS Library Reference N2006-1/16. They were specially arranged at the request of members of the U.S. House and Senate. No written summaries, such as those that would be recorded on forms reflected at pages 3 and 4 of that Library Reference have been preserved. Although the meetings have been summarized orally by those present to others within the Postal Service, no written lists of "action items" have been developed or circulated as a result of the meetings.

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APWU/USPS-T2-101 It has been reported that at the end of the town hall meeting held on June 5, 2006 to discuss the Rockford AMP, Mr. Galligan indicated that the Rockford AMP would be put on hold as the Postal Service had considerable work yet to do in considering the Rockford consolidation. Is this a correct interpretation of Mr. Galligan's remarks? If not, what commitment, if any, did Mr. Galligan make regarding the next step on the Rockford AMP?

RESPONSE

No. The Rockford AMP study had been on hold and had just resumed a short time prior to the public meeting. No study had been forwarded to Headquarters for consideration. District/Area level data collection and analysis was underway at the time. His commitment was that progress toward completion of the study would continue, with the expectation that a proposal would ultimately be submitted to him for decision.

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APWU/USPS-T2-102 The USPS' response to OCA/USPS-44 (j) indicates that a headquarters employee may not be present at each of the town hall meetings referenced in the May 1st revision to your testimony. Please describe the authority the USPS representative at each of those town hall meetings will have to provide information requested by meeting participants and to commit the Postal Service to address concerns raised by the participants.

RESPONSE

The primary purpose of the meeting is to describe the anticipated impact of the pending AMP consolidation proposal on postal services and to receive information reflecting the public's response to that anticipated impact.

Ordinarily, the District Manager for the District affected by the AMP feasibility study will be the lead Postal Service representative at the public input meeting. The lead representative at each meeting is authorized to disclose such information as is reflected in their prepared presentation as well as other relevant public information. It is impossible to anticipate the full spectrum of comments that may be expressed or information that may be requested by members of the public, members of postal employee unions, or others at such meetings. The public meeting process reflected in the Public Input Process is not intended to serve as a forum for requesting that the Postal Service make on-the-spot commitments to undertake certain responsive action or to provide certain records or data. The same is true of the written comment component of the Public Input Process. Persons seeking access to records not disclosed at a PIP meeting are free to pursue alternative methods for records access, such as the Freedom of Information Act. The postal representative is expected to take requests for action under advisement and, as appropriate, inform others of such requests for consideration.

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APWU/USPS-T2-103 Did the Postal Service organize the town hall meeting to discuss the Rockford AMP or was it organized by Representative Manzullo's office?

RESPONSE

The meeting was agreed to in response to a request from the Congressman and organized through consultations between the Postal Service and the Congressman's office before the establishment of the current AMP Public Input Process.

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APWU/USPS-T2-104 Please detail the steps the Postal Service took to publicize the Rockford town hall meeting.

RESPONSE

In addition to whatever steps may have been taken by the Congressman's office, the Postal Service sent written notification to public stakeholders, including local and federal elected officials advising them of the date, time and location of the Rockford town hall meeting. In addition, a media advisory was sent to print and broadcast media serving the Rockford and 610 ZIP Code areas.

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APWU/USPS-T2-105 Please list any specific invitations extended to mailers or community organizations to attend the Rockford town hall meeting.

RESPONSE

See the response to APWU/USPS-T2-104.

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APWU/USPS-T2-106 Please provide any Postal Service information packages available to the public in advance of the Rockford town hall meeting.

RESPONSE

No information packages were made available by the Postal Service in advance of the meeting.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS WILLIAMS
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APWU/USPS-T2-107 Please provide any Postal Service information packages or handouts distributed at the Rockford town hall meeting.

RESPONSE

No information packages or handouts were distributed by the Postal Service at the meeting.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS WILLIAMS
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APWU/USPS-T2-108 Please provide an example of any comment cards or similar items that were provided to the public at the Rockford town hall meeting for them to use to submit questions and concerns to the Postal Service.

RESPONSE

A sample comment card is attached.

Attachment to Response to APWU/USPS-T2-108

NAME: _____ DATE _____

ADDRESS: _____

CITY/STATE/ZIP CODE _____

PHONE: (LIST AREA CODE FIRST PLEASE) _____

COMMENTS: _____

CONSUMER AFFAIRS & CLAIMS
U.S. POSTAL SERVICE
500 E FULLERTON AVE
CAROL STREAM IL 60199-9631

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS WILLIAMS
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APWU/USPS-T2-109 How were the four AMP summaries that are currently shown at <http://www.usps.com/all/amp.htm> chosen? Is it the Postal Service's intention that all proposed AMPs will be summarized here? What factors will decide the timing of the posting of those summaries?

RESPONSE

Those four AMP proposals happened to be in the queue for final consideration at Headquarters at the time when the internet posting component of the Public Input Process was ready for testing.

As a part of the END AMP Public Input Process, it is the Postal Service's intention to post successive AMP proposals on the website, and to accompany each posting with information about the public meeting and the submission of written comments. Postings will occur after an AMP proposal has completed the cross-functional review process at Headquarters and is otherwise deemed ready for final consideration.

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

APWU/USPS-T2-110 On any changes related to END, how can the public/ stakeholders find information on: whether postal installations in their area will be studied or considered for expansion/ consolidation or closure.

- a) the specifics of what will be studied by an AMP
- b) the timetable for the study;
- c) the reasons for conducting this specific study and goals of the study;
- d) benchmark points in the study process;
- e) preliminary study results;
- f) possible changes that would be considered based on study results;
- g) opportunities to comment on study results;
- h) how they can suggest alternative matters to study;
- i) how they can suggest that existing problems or service levels be evaluated to determine if they are exacerbated or ameliorated by any possible change;
- j) how the public can get a list of suggestions and comments submitted by the public for Postal Service consideration;
- k) how the public can add their thoughts on such suggestions and comments;
- l) how the public gets feedback on their suggestions;
- m) how the public and stakeholders are notified about any decisions regarding their suggestions;
- n) if the local post office or district rejects or fails to consider a suggestion or proposal, how does someone make sure their suggestion or proposal comes to someone's attention when the AMP is passed to higher levels for approval?

RESPONSE

When a determination is made to initiate an AMP feasibility study, the communications process described in USPS Library References N2006-1/4 and N2006-1/12 takes effect.

- a. The AMP Communications Plan documents in USPS Library Reference N2006-1/12 reflects the level of information communicated publicly when the intent to conduct a feasibility study is announced. More detailed information is reflected in USPS Library Reference N2006-1/3, the Handbook PO-408.

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RESPONSE to APWU/USPS-T2-110 (continued):

- b. By reference to USPS Library Reference N2006-1/3, the Handbook PO-408.
- c. The AMP Communications Plan documents in USPS Library Reference N2006-1/12 reflects the level of information communicated publicly when the intent to conduct a feasibility study is announced.
- d. The feasibility study process is described in detail in USPS Library Reference N2006-1/3, the Handbook PO-408.
- e. Through the Public Input Process described in USPS Library Reference N2006-1/16.
- f. Through the Public Input Process described in USPS Library Reference N2006-1/16.
- g. Through the Public Input Process described in USPS Library Reference N2006-1/16.
- h. There is nothing to prevent a member of the public at any time, whether as part of the AMP Public Input Process or in a written response to an AMP proposal posted at www.usps.com, or randomly, from suggesting an alternative AMP proposal for consideration. The Postal Service neither encourages nor discourages such proposals. The Postal Service will give them such consideration as it, in its sole discretion, deems appropriate.
- i. Through the Public Input Process described in USPS Library Reference N2006-1/16. See the response to subpart (h).
- j. I am advised that the public may request PIP comment records under the Freedom of Information Act.

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RESPONSE to APWU/USPS-T2-110 (continued):

- k. The process is not intended to be interactive in that manner. However, subject to the constraint described in response to subpart (n), there is nothing to prevent members of the public who have obtained records described in response to subpart (j) from summarizing their opinions in writing and mailing them to whoever in the Postal Service they wish to receive them.
- l-m. The process is not intended to be interactive in that manner. Comments will be reviewed for consideration. There is no process for feedback.
- n. The PIP comment file for each AMP proposal is reviewed at Headquarters before any final decisions is made as part of the AMP process. Comments not submitted through the PIP have no assurance of such review.

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APWU/USPS-T2-111 What steps will the Postal Service take to publicize town hall meetings for discussion of each proposed AMP?

RESPONSE

Please refer to USPS Library Reference N2006-1/16.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS WILLIAMS
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APWU/USPS-T2-112 Please clarify your responses to POSTCOM/USPS-T2-4 (c) and witness Shah's response to APWU/USPS-T1-26. If the Postal Customer Council's are one of the ways that the USPS communicates with mailers about changes in the mail processing environment, why are the PCC's not used to solicit input from mailers about the potential impact of AMPs? Will PCC's be used in the future as one of the points to collect input for AMP studies?

RESPONSE

Postal Customer Council members and representatives are able to participate fully in the AMP Public Input Process, whether at public meetings or through the submission of written comments in response to AMP postings at www.usps.com.

The Postal Service does not consider it necessary to grant elevated status to Postal Customer Councils or their members for the purpose of receiving their comments as a part of that process.