

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

**Evolutionary Network Development
Service Changes, 2006**

Docket No. N2006-1

**FOLLOW-UP INTERROGATORIES OF THE AMERICAN POSTAL WORKERS
UNION, AFL-CIO TO THE USPS (APWU/USPS-9-14)
(July 12, 2006)**

Pursuant to Rules 25, 26, and 27 of the Rules of Practice, The American Postal Workers Union, AFL-CIO submits the following institutional interrogatories to the USPS. We would request an expedited response prior to the scheduled hearing date of July 18, 2006.

Respectfully submitted,

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APWU/USPS-9 In line 5 of page 2, of the Reply to Presiding Officer's Ruling No. N2006-1/25 (July 11, 2006) (hereinafter "Reply") you state that "[I]n each case an AMP study was **initiated** at the District/Area level. [Emphasis added here.]

- a. In the sentence quoted immediately above, what is meant by "District/Area"?
- b. For each of the five AMP operational consolidation AMP feasibility study candidates listed in footnote 4 of the USPS Reply (hereinafter "five studies") state whether the study was "initiated" at the District or Area level.
- c. For each of the five studies, state what is meant by the word "initiated."
- d. For each of the five studies, if the word "initiated" in this context means actually begun, state the date on which each study was initiated.
- e. For each of the five studies, if the word "initiated" in this context means requested, directed or ordered that the study be done, identify the individual or individuals by position or job title who requested, directed or ordered that the study be done.
- f. For each of the five studies, provide all documentation concerning communications noticing that the Postal Service had decided to launch an AMP study, including any notice to District, Area, or Headquarter management that a local AMP study would be initiated.

APWU/ USPS-10 In lines 7 and 8 on page 3 of the Reply, you refer to "cross-functional review."

- a. Define "cross-functional review."
- b. For each of the five studies, identify the "functions" that were a part of the "cross-functional review."
- c. Describe in detail how a "cross-functional review" leads to "completion" of a study.

APWU/USPS-11 In lines 8 and 9 on page 3 of the Reply, you state that "concerns" were communicated.

- a. For each of the five studies, list the "concerns" that were communicated to headquarters.
- b. For each of the five studies, state whether the concerns were expressed by postal officials at the Local, Area or District level.
- c. For each of the five studies, identify the official, by position or job title, who expressed the concerns to headquarters.

APWU/USPS-12 In line 10 on page 3 of the Reply, you state that a "consensus" was reached that there would be no further consideration of the five proposals at this time.

- a. State what you mean by the term "consensus."
- b. For each of the five studies, identify the officials, by position or job title, who participated in forming a "consensus" about whether to continue.

APWU/USPS-13 For each of the five studies, list the documents used or produced as part of the initiated study and attach copies of the documents to your answer to these interrogatories.

APWU/USPS-14 For each of the five questions and sub-parts of questions listed above, identify an individual by name and by position or job title, whether a postal official, a contractor employee, or some other type of representative, who has the knowledge or information necessary to answer the question or sub-part of a question posed above in this document, and state whether or not each individual identified could be made available to provide testimony on oral cross examination concerning the matters inquired into in these questions.