

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

EVOLUTIONARY NETWORK DEVELOPMENT)
SERVICE CHANGES, 2006)

Docket No. N2006-1

MOTION OF OFFICE OF THE CONSUMER ADVOCATE
TO ENTER INTO EVIDENCE IN THESE PROCEEDINGS
REPORT OF OFFICE OF THE INSPECTOR GENERAL
OF THE UNITED STATES POSTAL SERVICE
(July 21, 2006)

The Office of the Consumer Advocate hereby moves the admission into evidence of a Status Report (“Report”) of the Office of the Inspector General of the United States Postal Service (“OIG”) into the record of these proceedings as Exhibit No. OCA-2.¹

At the hearing on July 19, 2006, the OCA moved to enter the document into the record, but the Postal Service opposed on the grounds there is no foundation for the facts asserted in the document. The Presiding Officer ordered the document transcribed into the record where it was marked for identification as Exhibit No. OCA-2, subject to the filing of a written motion within seven days.
(Tr. 3/579.)

¹ “Management Advisory-Status Report on the Evolutionary Network Development Initiative,” Report Number NO-MA-06-001, March 20, 2006. The Status Report is addressed to Paul E. Vogel Vice President, Network Operations Management. At the time of the report, Mr. Vogel was the direct supervisor of USPS witness Williams whose responsibilities for AMP programs flowed directly down from Mr. Vogel. Witness Williams continues to report to the Vice President, Network Operations Management. Having been addressed to a Postal Service vice president, there is no doubt that this Report was discoverable with an institutional interrogatory and would have been admissible as evidence in that manner.

OCA submits that the Report document is directly relevant to this proceeding and that no additional foundational for the facts is necessary. The Report is an official document issued by a federal government agency (an independent Office in the USPS), issued in the normal course of its business and of which, in any event, the Commission may take official notice. The Postal Service did not challenge the actual authenticity of the document offered in evidence.

The document is one of a series of ongoing investigative reports being conducted by the OIG on the END program. The OIG states it interviewed Postal Service Headquarters officials as part of its review. (Report at 2.) The OIG found as a major END “challenge” that “documentation supporting the link between END and AMP was not always available.” (Report at 7, 8.) Further, the Report includes USPS management comments on that “challenge” and states the OIG plans to re-address the AMP and END integration issue later this fiscal year. (Report at 8.) Notably, the Report does not cite any objections to the facts asserted in the Report by Postal Service management in their comments to OIG.

OCA cross-examined USPS witness Williams in reference to the document. Witness Williams stated he has seen the document. (Tr. 3/577.) Witness Williams also testified in response to questioning by OCA that the Postal Service has not changed its AMP process in support of the OIG comment. (Tr. 3/578.) Also, relevant to the Report’s admission as evidence is the fact that it also includes a section entitled [USPS] “Management Comments.” That section further ties the Report to the USPS END management in this case. Additional

factual information regarding Postal Service network changes since 1995 is included in Appendix A of the Report which further demonstrates the Report's usefulness to the Commission in reviewing the END-AMP process.

OCA understands admission of the document as an OCA Exhibit will not serve as evidence the Postal Service management necessarily concurs in the findings of the OIG. The document speaks for itself and is offered in evidence as material relevant to the END proposal in this proceeding.

Wherefore, OCA moves the admission of the Report into evidence in these proceedings as Exhibit No. OCA-2.

Respectfully submitted,

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