

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

EVOLUTIONARY NETWORK DEVELOPMENT
SERVICE CHANGES, 2006

Docket No. N2006-1

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS WILLIAMS
TO OCA INTERROGATORY OCA/USPS-T2-22
(July 24, 2006)

The United States Postal Service hereby files the response of witness Williams to the following interrogatory of the Office of the Consumer Advocate dated June 13, 2006: OCA/USPS-T2-22. The interrogatory is stated verbatim and followed by the response.

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 OFFICE OF THE CONSUMER ADVOCATE**

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.

RESPONSE

- (a) None has been identified.
- (b) See the list below. Because of incomplete files and conflicting recollections about the status of past AMPs, it is not certain that this is a completely accurate list of AMP proposals approved since 1995.

Facility	Transferred	
Steubenville OH	Youngstown P&D	
Bradford PO	Erie P&DC	
Oil City PA	Erie P&DC	
Du Bois PO	Johnstown P&D	
Chillicothe, OH	Columbus, OH	Originating
Kankakee, IL SCF	Champaign, IL	Originating/Destinating
Washington, IN SCF	Terre Haute P&DF	Originating/Destinating
LaSalle, IL	Bloomington, IL	Originating/Destinating
West Jersey P&DC	DVD P&DC	
Bronx P&D	Morgan P&D	
Trenton NJ	Monmouth	Originating/Destinating
Rockland P&DC	Westchester P&DC	Originating
Anaheim CA	Santa Ana/Industry	Originating
Salinas CA	San Jose	Originating
Marina Del Rey	Los Angeles	Originating
Orange PO	Anaheim P&DF	Destinating
Hattiesburg, MS SCF	Gulfport, MS	Originating
Anniston, AL	Birmingham P&DC	Originating
Tuscaloosa, AL	Birmingham P&DC	Originating
Dothan, AL	Montgomery, AL P&DF	Originating

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RESPONSE to OCA/USPS-T2-22 (continued):

Facility	Transferred	
Longview&Tyler P&DC	East Texas P&DC	Originating/Destinating
Greenville PO	North Texas	Originating
Thief River Falls, MN	Grand Forks, ND	Originating/Destinating
Portland OR GMF	Sunset DDC	DPS/Sec Seg.
Pueblo, CO	Colorado Springs	Destinating
Seattle P&DC	Everett P&DF	Originating/Collections
Carrizozo	Alamogordo, NM	Originating/Destinating
Brighton, CO	Denver, CO	Destinating

- (c) The list includes Marina -- USPS Library Reference N2006-1/6.
- (d) The Newark NJ AMP, which is the subject of USPS Library Reference N2006-1/14.