

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

**Evolutionary Network Development
Service Changes, 2006**

Docket No. N2006-1

**FOLLOW-UP INTERROGATORIES OF AMERICAN POSTAL WORKERS
UNION, AFL-CIO TO USPS WITNESS WILLIAMS (APWU/USPS T2-114)
(July 28, 2006)**

Pursuant to Rules 25, 26, and 27 of the Rules of Practice, The American Postal Workers Union, AFL-CIO directs the following interrogatories to USPS witness David E. Williams. If the witness is unable to respond to any interrogatory, APWU requests that a response be provided by an appropriate person capable of providing an answer.

Respectfully submitted,

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APWU/USPS-T2-114 In follow-up to your response to APWU/USPS-T2-113 please refer to the documents provided in response to subparts (b) and (c):

- a. Slide 8 of the St. Petersburg presentation (pg 9/55), slide 7 of the Yakima presentation (pg 25/55) and slide 7 of the Jackson presentation (pg 40/55) all state “The AMP will be transparent to customers.” Please explain what is meant by “transparent to customers” and please detail how the Postal Service ensures this transparency.
- b. Slide 13 of the St. Petersburg presentation (pg 14/55) states “First-Class mail service will not be downgraded.” Please clarify whether this means that there will be no degradation in actual service *performance* or whether it means that no service *standards* will be downgraded.
- c. Slide 14 of the St. Petersburg presentation (pg 15/55) and slide 14 of the Jackson presentation (pg 47/55) state “There would be two post-implementation reviews (PIR) within 18 months to evaluate savings, service, and efficiencies.” Slide 12 of the Yakima presentation (pg 30/55) states “There would be two follow-up ‘post implementation’ Service and Efficiency Reviews within 18 months.” Please confirm that service performance is not evaluated in the post-implementation review process.
- d. Please confirm that a detailed summary of customer concerns was only produced for the Yakima public meeting (see page 51-54/55). If confirmed, please explain why a detailed summary of customer concerns was not produced for the St. Petersburg or Jackson meetings. If not confirmed, please provide the detailed summary of customer concerns generated for the St. Petersburg and Jackson public meetings.