

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

EVOLUTIONARY NETWORK DEVELOPMENT  
SERVICE CHANGES, 2006

Docket No. N2006-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO APWU INTERROGATORY REDIRECTED FROM WITNESS WILLIAMS  
(APWU/USPS-T2-114)  
(August 11, 2006)

The United States Postal Service hereby submits its responses to the following interrogatory of the American Postal Workers Union, AFL-CIO, filed on July 28, 2006: APWU/USPS-T2-114. The interrogatory has been redirected from witness Williams to the Postal Service for institutional response.

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 THE UNITED STATES POSTAL SERVICE TO  
INTERROGATORY OF AMERICAN POSTAL WORKERS UNION  
REDIRECTED FROM WITNESS WILLIAMS**

**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 postimplementation 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.

**RESPONSE**

- a. The statement is intended to convey the notion that that the consolidated operations are “back of the house” in nature, invisible to the general public, as opposed to retail window service, for example.
- b. The latter.
- c. As indicated in several earlier interrogatory responses, operational and service performance monitoring are ongoing postal management functions conducted irrespective of whether an AMP consolidation was performed in a service area or whether the operations in that area are the subject of an AMP PIR.

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**RESPONSE to APWU/USPS-T2-114 (continued):**

- d. Confirmed. As the Public Input Process was initiated at these sites, the standard public comment reporting forms now reflected in the first few pages of USPS Library Reference N2006-1/16 were being developed. As a consequence, the Yakima, St. Petersburg and Jackson meetings produced different approaches to the task of reporting public comments. As the aforementioned forms are applied in the future, one can expect more standardization in reporting.