

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

**Evolutionary Network Development
Service Changes, 2006**

Docket No. N2006-1

**RESPONSE OF THE AMERICAN POSTAL WORKERS UNION, AFL-CIO,
TO INTERROGATORIES OF USPS (USPS/APWU-T1-2(b c) and 9(c-d))
REDIRECTED FROM WITNESS YAO (APWU-T-1)
(September 29, 2006)**

The American Postal Workers Union, AFL-CIO hereby submits its response to the following interrogatories of USPS: USPS/APWU-T1-2(b-c) and 9(c-d), filed on September 15, 2006, redirected from witness Yao (APWU-T-1) to the APWU for an institutional response.

Each interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

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USPS/APWU-T1-2

- (a) Please refer to USPS Library Reference N2006-1/5. Assume that, as a part of the review of each AMP mail processing and transportation consolidation proposal, the Postal Service, analyzes and relies upon mail volume and operations data that it regards to be commercially sensitive. Assume also that the Postal Service considers that the public disclosure of such data would result in private delivery firms such as Federal Express and United Parcel Service gaining an unfair advantage in competition for the provision of delivery services, to the economic detriment of the Postal Service and its employees.
- (1) Please refer to the first paragraph of page 16 of APWU-T-1. Would you regard the Postal Service as “arrogant” if, while seeking public input regarding a particular AMP consolidation proposal, it determined that it was necessary to withhold some operational and volume data pertinent to that AMP proposal from public disclosure to protect the aforementioned economic interests? If so, please explain.
- (2) What advice would you offer the Postal Service or what procedures would you recommend that it employ as it sought to strike a balance between providing the public with information regarding a particular AMP proposal and protecting the above-referenced economic interests?
- (b) With regard to USPS Library Reference N2006-1/5, is it the position of the American Postal Workers Union that no harm could result to the economic interests of the Postal Service if data such as those described above in subpart (b) were routinely publicly disclosed? If so, please explain.
- (c) With regard to USPS Library Reference N2006-1/5, is it the position of the American Postal Workers Union that no harm could result to the economic interests of the American Postal Workers Union if data such as those described above in subpart (b) were routinely publicly disclosed? If so, please explain.

Response:

- (a) Retained by Witness Yao.

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(b-c) No¹, but it is not the APWU position that data of this sort must be routinely disclosed to the public. The Postal Service's public input process must be meaningful and therefore, accurate relevant sufficient information specific to pertinent issues raised by affected communities must be provided. Relevant information likely will not be commercially sensitive, but where sensitive information is relevant, it may be disclosed in a manner that would not result in harm to the economic interests of the Postal Service or the APWU. See, for example APWU Witness Yao Response to Interrogatory USPS/APWU-T1-2(a) (September 29, 2006).

¹ APWU is highly skeptical about any potential harm. See Motions of American Postal Workers Union, AFL-CIO to Compel USPS to Answer Interrogatories APWU/USPS-T1-9 and APWU/USPS-T2-1(a,f,g,h), 3(b), 6(k), and 8 (February 28, 2006), where APWU argues that despite USPS' assertions, it has not shown any basis for withholding such information. Nonetheless, APWU has respected USPS wishes for nondisclosure.

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USPS/APWU-T1-9

Please refer to line 5 of page 18 of APWU-T-1.

- (a) Define what you mean by “Community identity, related to postmarks”.
- (b) Please provide the street, city, state and 5-digit ZIP Code addresses for AmericaSpeaks and the American Postal Workers Union.
- (c) Please provide a xerox copy of:
 - (1) an unused copy of a sheet of letterhead stationery typically used for external correspondence at each address provided in response to subpart (b);
 - (2) an unused copy of the front of a mailing envelope bearing the name, logo, and/or address of each organization.
- (d) For each address identified in response to subpart (b), please identify the postal facility by street address and/or 5-digit ZIP Code at which the organization’s outgoing stamped mail is routinely tendered for acceptance. If the stamped mail is not taken to a postal facility for acceptance, please describe the method by which it is tendered to the Postal Service or entered into the mail stream.

Response:

- (a) Retained by Witness Yao.
- (b) Retained by Witness Yao.
- (c) Response pertaining to AmericaSpeaks provided by Witness Yao.
Regarding the APWU, see attached letterhead and envelope. Each has been voided to prevent misuse.
- (d) The Postal Service makes a daily pick-up of mail, but on a regular basis APWU also takes mail to the postal facility at
1400 L ST NW LBBY
WASHINGTON DC 20005-9997

APWU

American Postal Workers Union, AFL-CIO

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