

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

EVOLUTIONARY NETWORK DEVELOPMENT  
SERVICE CHANGES, 2006

Docket No. N2006-1

RESPONSES OF THE UNITED STATES POSTAL SERVICE  
TO ASSOCIATION OF PRIORITY MAIL USERS INTERROGATORIES  
REDIRECTED FROM WITNESS SHAH  
(APMU/USPS-T1-7(d,e,g,h)  
(July 10, 2006)

The United States Postal Service hereby submits its responses to the following interrogatories directed by the Association of Priority Mail Users to witness Shah on June 16, 2006: APMU/USPS-T1-7(d), (e), (g) and (h). Each interrogatory has been redirected to the Postal Service for an institutional response. Each interrogatory is stated verbatim and followed by the response. Objections to subparts (a) through (c) and (f) were filed on June 27, 2006.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF ASSOCIATION OF PRIORITY MAIL USERS**

**APMU/USPS-T1-7.**

- a. What lessons were learned from the Priority Mail Processing Center (“PMPC”) “re-engineering” efforts and the Emery Worldwide contract for Priority Mail processing which had serious adverse cost and service effects on Priority Mail? If the lessons learned are contained in any documents which subsequently evaluated that re-engineering exercise, please provide copies of each.
- b. Please explain how have those lessons have been applied to the current “redesign” effort.
- c. Within the Postal Service, was there any accountability for the PMPC and Emery mistakes? If so, what was it?
- d. What assurance do mailers have that the network “redesign” effort described in your testimony will not increase costs, either for Priority Mail or other mail, as the PMPC network increased Priority Mail costs (which represented a “reengineering” of the processing and transportation of Priority Mail)?
- e. By what criteria (e.g., improved service, or reduced total costs) will success of the network redesign effort be measured?
- f. Please explain what the Postal Service has done to improve the accountability for this network redesign effort vis-a-vis accountability for the PMPC network re-engineering effort.
- g. If the network redesign effort is deemed unsuccessful, will it be reversed or left in place?
- h. If the network redesign effort is deemed unsuccessful, when will mailers be told, what will they be told, how will they be informed, and what after-the-fact accountability will exist within the Postal Service?

**RESPONSE**

- a-c. [Objections filed.]
- d. [Partial objection filed.] An increase in overall cost is antithetical to the goals of Evolutionary Network Development. The Postal Service expects to be judged on the basis of results it will produce, rather than the number of positive declarations it can offer.
- e. By improvements in both efficiency and consistency in service.
- f. [Objection filed.]

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**RESPONSE TO APMU/USPS-T1-7 (continued):**

g-h. Even if subpart (g) included a third outcome (flaws being fixed), these questions still call for baseless speculation about outcomes, postal management decisions, and public communications strategies that would unfold years from now and that are presently impossible to predict.