

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

**REQUEST OF THE UNITED STATES POSTAL SERVICE  
FOR AN ADVISORY OPINION ON CHANGES IN  
POSTAL SERVICES**

**Docket No. N2006-1**

**SECOND SET OF INTERROGATORIES OF  
THE ASSOCIATION FOR POSTAL COMMERCE  
TO USPS WITNESS PRANAB M. SHAH**

**(POSTCOM/USPS-T1-3 - 16)**

Pursuant to Sections 25 through 27 of the rules of practice, the Association for Postal Commerce directs the attached First Set of Interrogatories to Witness Pranab M. Shah. If the witness is unable to respond to any interrogatory or request for production of documents, PostCom requests that a response be otherwise provided by the Postal Service.

Respectfully submitted,

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DC2:752455

**POSTCOM/USPS-T1-3.** USPS Library Reference N2006-1/9 provides a copy of presentation slides from a technical conference that was held to address the Evolutionary Network Development model. With respect to slide no. 3, please describe the "Distribution Concept". What are the various "Distribution Concepts" that the Postal Service considered?

**POSTCOM/USPS-T1-4.** Please refer to USPS Library Reference N2006-1/9, slide 5.

- a. Please spell out all the abbreviations used on this slide to describe the current network.
- b. Please describe each facility in the current network in terms of the types of mail eligible to be entered, and degree of preparation required for the mail to be entered at each facility. Specifically, please identify the types of mail eligible to be entered at each facility and the degree of preparation by shape, subclass, rate category and rate element, including presort and destination entry discounts. Please also include in your discussion Delivery Distribution Centers (DDCs) and Area Mail Processing Centers (AMPS), and any other current facility types.

**POSTCOM/USPS-T1-5.** Please refer to USPS Library Reference N2006-1/9, slide 6.

Please describe each facility in the future network in terms of the types of mail eligible to be entered, and degree of preparation required for the mail to be entered at each facility in the current network. Specifically, please identify the types of mail eligible to be entered at each facility and the degree of preparation by shape, subclass, rate category and rate element, including presort and destination entry discounts.

**POSTCOM/USPS-T1-6.** Please refer to USPS Library Reference N2006-1/9, slide 6. Please describe each facility in the future network in terms of the types of mail sorting equipment generally expected to be located at each facility type, and the subclasses of mail expected to be sorted.

**POSTCOM/USPS-T1-7.** Please provide copies of any flowcharts, slides, or other documents that provide any information generally or specifically responsive to questions POSTCOM/USPS-T1-4, POSTCOM/USPS-T1-5 and POSTCOM/USPS-T1-6.

**POSTCOM/USPS-T1-8.** Please relate or map the general activities performed at each current network facility type (as identified in response to POSTCOM/USPS-T1-4) to the general activities performed at each future network facility type (as identified in response to POSTCOM/USPS-T1-5).

**POSTCOM/USPS-T1-9.** How have the avoided costs that may result from the consolidations that occur between FY2005 and FY2008 (inclusive) as a result of Evolutionary Network Design and AMP consolidations that are implemented during these years been estimated? Please identify any documents that estimate and/or reflect these avoided costs.

**POSTCOM/USPS-T1-10.** Please provide copies of any documents identified in response to POSTCOM/USPS-T1-9.

**POSTCOM/USPS-T1-11.** Have any Postal Service studies been conducted to identify the changes in the preparation and entry requirements applicable to mail that is presorted and/or destination entered? If so, please provide the results of such studies.

**POSTCOM/USPS-T1-12.** Are any Postal Service studies to identify the changes in the preparation and entry requirements applicable to mail that is presorted and/or destination entered planned or in progress? If so, please identify describe the scope, anticipated completion dates, and any preliminary results of these studies.

**POSTCOM/USPS-T1-13.** Do any of the studies identified in response to POSTCOM/USPS-T1-1-10 and/or POSTCOM/USPS-T1-11 attempt to quantify the costs to the mailers of changing these preparation and entry requirements (including, but not limited to, changes in entry destinations).

**POSTCOM/USPS-T1-14.** Please describe the constraints applied in the END model with respect to service standards.

**POSTCOM/USPS-T1-15.** Please describe how the END model (in particular, the Simulator) is used to evaluate locally whether an individual AMP proposal is feasible from the Postal Service's and the mailers' perspective. Please provide an example of this analysis.

**POSTCOM/USPS-T1-16.** Please indicate whether and when mailers that enter significant destination entry volumes at facilities that may be affected by proposed AMP consolidations will be consulted before a final decision is made regarding the AMP proposal. Prior to a final decision, will these mailers be asked for input to perform a "reality-check" on the simulated volumes and timing of arrival of these volumes at the proposed, consolidated facility that are generated from the END model? If not, why not?