

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 INTERROGATORY THE AMERICAN POSTAL WORKERS UNION  
(APWU/USPS-T2-58)  
(June 5, 2006)

The United States Postal Service hereby submits its response to the following interrogatory of the American Postal Workers Union, filed on May 10, 2006:

APWU/USPS-T2-58. The interrogatory has been redirected from witness Williams to the Postal Service for an institutional response. The interrogatory is stated verbatim and is 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 THE AMERICAN POSTAL WORKERS UNION  
REDIRECTED FROM WITNESS WILLIAMS**

**APWU/USPS-T2-58.** On May 3, 2006, the Postal Board of Governors approved a new collocated processing center and vehicle maintenance facility in Oklahoma City, OK.

- a) Please confirm that this new processing facility will become a regional distribution center. If not, please identify which type of facility it will become.
- b) Please provide a detailed description of the information that the END process provided to the decision-makers in deciding to build a new processing center at this location.
- c) The presentation to the BOG indicated that parcels and bundles from the Tulsa P&DC, the Little Rock P&DC, the Fayetteville P&DF and the Ft. Smith MPO would be moved to this new processing center.
  - i) Please identify which classes of mail are included in this transfer
  - ii) Was the AMP process used to make the decisions to move this mail to the Oklahoma City processing facility?
  - iii) If the AMP process was not used, please describe in detail the process by which the decisions were made to move the mail from each of these facilities to the Oklahoma facility
- d) Will originating mail from other postal facilities be moved to the Oklahoma Processing Center when it is complete?
  - i) If so, was the AMP process used to make that determination?
  - ii) If originating mail will be moved and an AMP process was not used please provide a description of the process that was used to make these decisions

**RESPONSE**

- a) The new Oklahoma facility has the potential to be both a Regional Distribution Center (RDC) and a Local Processing Center (LPC).
- b) Confirmation that the proposed facility was aligned with the future network concept.
- c)
  - i) All classes.
  - ii) No.
  - iii) As part of the future network design Regional Distribution Centers will process all parcels and bundles. END modeling suggested that operations from nearby facilities could potentially be relocated.

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**RESPONSE TO APWU/USPS-T2-58 (continued):**

d) It is possible, at which time an AMP study would be initiated if required.

See the response to subpart (c)(iii).