

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

**Evolutionary Network Development
Service Changes, 2006**

Docket No. N2006-1

**INTERROGATORIES OF AMERICAN POSTAL WORKERS UNION, AFL-CIO TO
USPS WITNESS SHAH (APWU/USPS T1-1-9)
(February 17, 2006)**

Pursuant to Rules 25, 26, and 27 of the Rules of Practice, The American Postal Workers Union, AFL-CIO directs the following interrogatories to USPS witness Pranab M. Shah. If the witness is unable to respond to any interrogatory, APWU requests that a response be provided by an appropriate person capable of providing an answer.

Respectfully submitted,

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APWU/USPS-T1-1 On page 1 of your testimony, you state your purpose is to “provide an overview of the Postal Services’ Evolutionary Network Development (END) strategy.

- a) Are END models the major tool used for the END strategy? If there are other tools, please identify them.
- b) Are all END decisions being initiated due to recommendations provided by END model runs? If not, what other avenues can lead to the initiation of a consolidation under the END program?

APWU/USPS-T1-2 On page i of your testimony, you identify yourself as the Manager of Network Operations Development and identify the five major subgroups of that group.

- a) What is the purpose of the Network Modeling and Development subgroup and what activities does it perform?
- b) What is the purpose of the Logistics Systems subgroup and what activities does it perform?
- c) What is the purpose of the Integrated Network Development subgroup and what activities does it perform?
- d) What is the purpose of the Business Opportunity Development subgroup and what activities does it perform?
- e) What is the purpose of the Logistics Quality Support subgroup and what activities does it perform?

APWU/USPS-T1-3 On page 9 of your testimony you discuss the END modeling approach and the two different types of models involved.

- a) How many different END models are there? Please identify them.
- b) What types of computer software and hardware are used to run them?
- c) Please identify the primary sources of data used in each model and indicate how often those data are updated.
- d) Please provide a listing of all variables included in these models and a description of each variable.
- e) Which data produced from the AMP process are used in the END models?

APWU/USPS-T1-4 On page 11 of your testimony you discuss the strategy of building a ‘backbone’ network infrastructure of Regional Distribution Centers (RDCs).

- a) Please provide a list of all current facilities that, based on current analysis, will become Regional Distribution Centers.
- b) If not all Regional Distribution Centers have been identified, list all current facilities that are being considered for use as Regional Distribution Centers.
- c) When do you expect to establish this backbone Regional Distribution Center network infrastructure?
- d) Will any Regional Distribution Centers not come from facilities already in the USPS’ network? If so, where will they come from?

APWU/USPS-T1-5 Mr. Williams has provided an attachment containing 41 AMPs currently underway. Are any of the “gaining” facilities on that list subject to an AMP proposal that might later affect the mail processed in that facility?

APWU/USPS-T1-6 Other points in this redesigned network are identified as Local Processing Centers and Surface Transfer Centers.

- a) Please provide a list of current facilities that will, based on current analysis, become Local Processing Centers.
- b) Please provide a list of current facilities that may, based on current analysis, become Local Processing Centers.
- c) Please provide a list of current facilities that will, based on current analysis, become Surface Transfer Centers.
- d) Please provide a list of current facilities that may, based on current analysis, become Surface Transfer Centers.
- e) Will any facilities not currently in the USPS network become Local Processing Centers or Surface Transfer Centers? If so, where will those facilities come from?
- f) Please describe Multipurpose Centers and their role in the reconfigured network. Please provide a list of current facilities that will, based on current analysis, become Multipurpose Centers.

APWU/USPS-T1-7 What is your role in the decision making process related to END consolidations? Who makes the final decision for such consolidations?

APWU/USPS-T1-8 You state on page 14 of your testimony that at this time, “the Postal Service expects that service changes are likely to be most pronounced for First-Class Mail and Priority Mail.”

- On what is that expectation based? Have there been studies conducted on this topic? If so please identify those studies and provide them for the record.
- Would it be correct to state that the service changes for First Class Mail will be mostly for collection mail or other First Class Mail that is not eligible for barcode or carrier route presort discounts?

APWU/USPS-T1-9 DBP/USPS-14 requests a listing of mail processing facilities and specified information regarding each facility. In addition to the information requested in DBP/USPS-14, provide the following additional information for each facility, and provide all requested information in response to this interrogatory and DBP/USPS-14 in both paper and as an electronic data file:

- 5) The size of the facility
- 6) Whether the facility has operations on one floor or multiple floors
- 7) The types of mail processing operations at the facility
- 8) The type and number of mail processing equipment in use in each facility
- 9) The mail processing complement by craft in each facility

- 10) The monthly average volume of mail processed by type of mail for the most recent 12 month period.