

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

EVOLUTIONARY NETWORK DEVELOPMENT
SERVICE CHANGES, 2006

Docket No. N2006-1

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS WILLIAMS
TO APWU INTERROGATORY APWU/USPS-T1-5
REDIRECTED FROM WITNESS SHAH
(February 27, 2006)

The United States Postal Service hereby submits the response of witness Williams to the following interrogatory of the American Postal Workers Union, AFL-CIO, filed on February 17, 2006: APWU/USPS-T1-5. The interrogatory has been redirected from witness Shah to witness Williams for response.

The interrogatory is stated verbatim and followed by the responses.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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February 27, 2006

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS WILLIAMS
TO INTERROGATORY OF AMERICAN POSTAL WORKERS UNION
REDIRECTED FROM WITNESS SHAH**

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 at that facility?

RESPONSE

In theory, all mail processing facilities are candidates for AMP review. Therefore, it is possible for a facility that gains operations as the result of an AMP review conducted today to undergo an AMP review later that might affect mail processed at that facility.