

**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 T1-10-11)
(March 23, 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-T1-10 In a presentation to APWU officers and staff on February 14, 2006 the following facilities were identified as being assigned the indicated role in the new network. Please confirm that this information is accurate or provide corrected information for any facility pairings that are in error:

- a) Boston P&DC will remain a multi-purpose facility.
- b) Current BMCs will become RDCs with the exception of Chicago where the Busse P&DC will become a RDC.

APWU/USPS-T1-11 To clarify your response to APWU/USPS-T1-4 (d) and APWU/USPS-T1-6(e), will new facilities be those built or purchased or leased as Postal Service facilities or could some of those facilities be owned or leased by Postal contractors?