

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

EVOLUTIONARY NETWORK DEVELOPMENT
SERVICE CHANGES, 2006

Docket No. N2006-1

RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS SHAH
TO APWU INTERROGATORIES APWU/USPS-T1-10 AND 11
(March 28, 2006)

The United States Postal Service hereby submits the responses of witness Pranab Shah to the following interrogatories of the American Postal Workers Union, filed on March 23, 2006: APWU/USPS-T1-10 and 11.

Each interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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March 28, 2006
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**RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DAVID POPKIN**

DBP/USPS-48. Please refer to the response to DBP/USPS-14. [a] What do L&DC, DDC, MHA, and AMPC stand for? [b] Please discuss how an L&DC, DDC, MHA, and AMPC fit into the overall transportation process. [c] Please discuss how the difference between a P&DC and a P&DF fit into the overall transportation process. [d] Please discuss how the differences between an MPC, CSNPF, MPO and PO fit into the overall transportation process.

RESPONSE:

[a] Logistics & Distribution Center (L&DC), Delivery Distribution Center (DDC), Mail Handling Annex (MHA), Area Mail Processing Center (AMPC).

[b] An L&DC is a network facility which may perform transportation consolidation from a number of origins/destinations, MHA and AMPCs may be both origins and destinations for mail volume transported within the network, DDCs are primarily destinating facilities and therefore receive only destination mail.

[c] The differences impact the amount of transportation required as well as the destinations served.

[d] See response to subpart c.

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

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.

RESPONSE:

a&b) Confirmed.

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

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?

RESPONSE:

The Postal Service evaluates each new facility project based on operational requirements and financial criteria. It cannot now be predicted which options might be best suited for each future facility.