

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

**REQUEST OF THE UNITED STATES POSTAL SERVICE
FOR AN ADVISORY OPINION ON CHANGES IN
POSTAL SERVICES**

Docket No. N2006-1

**FIRST SET OF INTERROGATORIES OF
THE ASSOCIATION FOR POSTAL COMMERCE
TO USPS WITNESS PRANAB M. SHAH**

(POSTCOM/USPS-T1-1-2)

Pursuant to Sections 25 through 27 of the rules of practice, the Association for Postal Commerce directs the attached First Set of Interrogatories to Witness Pranab M. Shah. If the witness is unable to respond to any interrogatory or request for production of documents, PostCom requests that a response be otherwise provided by the Postal Service.

Respectfully submitted,

Ian D. Volner
Rita L. Brickman
Venable LLP
575 7th Street, NW
Washington, DC 20004-1601
(202) 344-4814
idvolner@venable.com
Counsel to Association for Postal Commerce

March 29, 2006

DC2:736322

POSTCOM/USPS-T1-1. Your testimony (at p. 13) explains that the Postal Service anticipates service standard changes affecting particular 3-digit ZIP Code service area origin-destination pairs. In footnote four, you briefly describe Library Reference N2006-1/2, which provides information regarding how the service standards for each mail class currently apply to the matrix of approximately 850,000 3-digit ZIP code origin-destination pairs in the postal network.

(a) Does the Postal Service have information concerning the service, in terms of the number of days from origin to destination, actually provided or typically provided with respect to each of the 850,000 3-digit ZIP code origin-destination pairs in the postal network for Standard Mail? For Periodicals? If so, please describe this information.

(b) Please provide a copy of this information for a recent and reasonable reporting period.

(c) If the Postal Service has such information, will the Postal Service use this information in the course of its post-implementation review to report on whether the service upgrades or downgrades that are anticipated by each of the approved AMP proposals are achieved as planned?

(d) If the Postal Service does not have such information, how will the Postal Service evaluate service (in terms of number of days from origin to destination) as part of its post-implementation review?

POSTCOM/USPS-T1-2. In your testimony (at pp.2 -6), you describe the complexities and redundancies of today's postal network. On p. 6 you describe the Postal Service's goals to reduce excess capacity and eliminate redundant operations.

On page 10 of Mr. Williams testimony, he explains that the Postal Service facilities within each service area share many functions, but the numbers roles and relationships of nearby mail processing facilities can vary, as can equipment deployments and configurations.

(a) Is the Postal Service making an effort to move towards a goal of greater standardization of mail processing and facilities? Please explain in detail.

(b) If the Postal Service has a goal of greater standardization of mail processing and facilities, does the AMP process and/or the Postal Service's application of the END program contemplate this goal? If so, how? If not, why not.