

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 OCA INTERROGATORIES OCA/USPS-T1-19-20
(April 7, 2006)

The United States Postal Service hereby submits the responses of witness
Pranab Shah to the following interrogatories of the Office of the Consumer Advocate,
filed on March 21, 2006: OCA/USPS-T1-19-20.

Each interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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April 7, 2006

**RESPONSE OF THE UNITED STATES POSTAL SERVICE WITNESS SHAH TO
INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE**

OCA/USPS-T1-19

Please confirm that on February 8, 2006, the Postal Service issued News Release No. 06-008, that included the announcement: "The Board approved the redirection of funds toward the development and testing of a Flats Sequencing System (FSS) which will allow the sequencing of larger mail pieces in delivery point order."

- a. If you are unable to confirm the News Release, please explain.
- b. Please indicate whether or not the results of the testing of the FSS will impact consolidations.

RESPONSE

- (a) Confirmed.
- (b) When the FSS program is far enough along to generate a reliable quantifiable basis for estimating the impacts, it will be integrated into the future mail processing network.

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OCA/USPS-T1-20

The Greensburg, Pennsylvania Post Office is one of the facilities whose originating operations will be consolidated into a Processing and Distribution Center (P&DC - Pittsburgh). What is the number of post offices that are potential candidates for some consolidation into a P&DC?

RESPONSE

In theory, all post offices that perform automated sorting operations that could be moved upstream to a P&DC are potential candidates for consolidation as a part of routine AMP review. It is impossible to estimate how many such proposals the END initiative may generate.