

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 SHAH
TO POSTCOM INTERROGATORY (POSTCOM/USPS-T1-2)
(April 12, 2006)

The United States Postal Service hereby submits the responses of witness Shah to the following interrogatories of POSTCOM, filed on March 29, 2006:

POSTCOM/USPS-T1-2. The interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux
Chief Counsel, Ratemaking

Michael T. Tidwell

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2998; Fax -5402
March 24, 2006
michael.t.tidwell@usps.gov

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS SHAH
TO INTERROGATORY OF POSTCOM**

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.

RESPONSE:

- a. Yes, the deployment of more standardized automation, standardized operating procedures and the monitoring of those procedures, standardized facility layouts as well as the re-alignment of the overall network all support the USPS' move toward standardization
- b. Yes, the END program designed a future distribution concept around the principles of increased standardization.