

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

EVOLUTIONARY NETWORK DEVELOPMENT  
SERVICE CHANGES, 2006

Docket No. N2006-1

REVISED RESPONSE OF  
UNITED STATES POSTAL SERVICE WITNESS WILLIAMS  
TO VALPAK INTERROGATORY VP/USPS-T2-2  
(April 14, 2006) [ERRATA]

The United States Postal Service hereby submits the revised response of witness Williams to the following interrogatory of Valpak: VP/USPS-T2-2. The revised response incorporates the original responses to subparts (a-c) filed on April 12<sup>th</sup> and now includes the response to subpart (d). The revised response to VP/USPS-T2-2 filed today supersedes the April 12th response. The interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS WILLIAMS  
TO INTERROGATORY OF VALPAK**

**Revised: April 14, 2006**

**VP/USPS-T2-2.**

Your testimony at page 3, lines 10-12, states that “[I]n years past, the vast majority of AMP proposals have involved consolidation of outgoing First-Class Mail operations.”

- a. Do each of the 10 AMP proposals included in library reference USPS-LR-2006-1/5 involve consolidation of outgoing First-Class Mail operations?
- b. Do any of the 10 AMP proposals included in library reference USPS-LR-2006-1/5 involve consolidation of outgoing operations for any other class of mail? If so, please specify each other class being consolidated.
- c. Is it correct that each of the 10 AMP proposals included in library reference USPS-LR-2006-1/5 requires the Postal Service to incur additional transportation cost? Please explain any negative answer.
- d. To the extent that the Postal Service incurs additional transportation cost as a result of any of the 10 AMP proposals included in library reference USPS-LR-2006-1/5, are all of those additional costs incurred in Cost Segment 14, purchased transportation? If not, in what Cost Segment are those additional transportation costs incurred?

**RESPONSE**

- (a) Yes.
- (b) Yes. All originating operations are affected.
- (c) No. Re-examine each Worksheet 9 in that Library Reference.
- (d) The transportation involved is both highway contract transportation and postal transportation.