

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

**Evolutionary Network Development
Service Changes, 2006**

Docket No. N2006-1

**INTERROGATORIES AND REQUESTS FOR PRODUCTION
OF DOCUMENTS OF PITNEY BOWES INC.
TO UNITED STATES POSTAL SERVICE WITNESS PRANAB M. SHAH
(PB/USPS-T1-1-11)**

Pursuant to Rules 25 through 28 of the Rules of Practice of the Postal Rate Commission, Pitney Bowes Inc. ("Pitney Bowes") directs the following interrogatories and requests for production of documents to United States Postal Service Witness Pranab Shah.

Respectfully submitted,

_____/s/_____
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DATED: April 19, 2006

PB/USPS-T1-1. Please provide your best estimate of average haul (average distance transported) on purchased transportation in FY 2004 for First-Class Mail Single Piece Letters, First-Class Mail Presort Letters, Priority Mail, Express Mail, Periodicals Within County, Periodicals Outside County, Standard Mail Enhanced Carrier Route, Standard Mail Regular, Package Services Parcel Post, Package Services Bound Printed Matter, and Package Service Media Mail.

PB/USPS –T1-2. Please provide the source of each of the estimates in 1 above.

PB/USPS –T1-3. Please provide your best estimate of average haul on purchased transportation in FY 2005 for First-Class Mail Single Piece Letters, First-Class Mail Presort Letters, Priority Mail, Express Mail, Periodicals Within County, Periodicals Outside County, Standard Mail Enhanced Carrier Route, Standard Mail Regular, Package Services Parcel Post, Package Services Bound Printed Matter, and Package Service Media Mail.

PB/USPS –T1-4. Please provide the source of each of the estimates in 3 above.

PB/USPS –T1-5. Please explain how the Postal Service expects the implementation of the Evolutionary Network Development (“END”) service changes to affect the average hauls in 1 and 3 above.

PB/USPS –T1-6. Please provide a list of all facilities at which the Postal Service performs delivery point sequencing (“DPS”) for letters.

PB/USPS –T1-7. Please confirm that in today’s network delivery point sequencing of letters is generally performed at destination sectional center facilities (“DSCF”). If not confirmed, please explain fully the classification of facility where DPS is generally performed in today’s network.

PB/USPS –T1-8. Please confirm that in the future END network delivery point sequencing of letters is expected to be performed at local processing centers. If not confirmed, please explain fully the classification of facility where USPS expects to perform DPS in the future network.

PB/USPS –T1-9. Please confirm that First-Class Mail presort letters entered by mailers at the facility where they will be delivery point sequenced do not incur any distance-related surface transportation costs by the Postal Service. If not confirmed, please explain fully and provide your best estimate of the proportion of distance-related transportation costs by the Postal Service that would be incurred by these letters.

PB/USPS –T1-10. Please confirm that First-Class Mail presort letters entered by mailers at the facility where they will be delivery point sequenced will not incur any air transportation costs by the Postal Service. If not confirmed, please explain fully and provide your best estimate of the proportion of air transportation costs by the Postal Service that would be incurred by these letters.

PB/USPS –T1-11. Do First-Class Mail presort letters that are entered at the facility where they will be delivery point sequenced incur a smaller amount of non-distance related surface transportation costs by the Postal Service than other First-Class Mail presort letters? If so, please explain why.