

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

**Evolutionary Network Development
Service Changes, 2006**

Docket No. N2006-1

**INTERROGATORIES OF AMERICAN POSTAL WORKERS UNION, AFL-CIO TO
USPS WITNESS SHAH (APWU/USPS T1-19-21)
(April 21, 2006)**

Pursuant to Rules 25, 26, and 27 of the Rules of Practice, The American Postal Workers Union, AFL-CIO directs the following interrogatories to USPS witness Pranab M. Shah. If the witness is unable to respond to any interrogatory, APWU requests that a response be provided by an appropriate person capable of providing an answer.

Respectfully submitted,

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APWU/USPS-T1-19 In response to APWU/USPS-T1-6(c) and (d) you stated that all RDCs would become Surface Transfer Centers but could not provide a list of facilities that would become STCs because it had not been determined yet. In his presentation to MTAC on February 22, 2006, Mr. Vogel identified six new Surface Transfer Center Activations during 2006 (three to be activated on April 22, 2006, one to be activated on August 5, 2006 and two to be activated on October 30, 2006). In addition, Mr. Vogel indicated that fifteen HASP locations would become Surface Transfer Centers this year.

- a) Have any facilities other than the ones identified by Mr. Vogel in his MTAC presentation, already been identified as Surface Transfer Centers? If so, please identify those facilities.
- b) Of the six facilities identified by Mr. Vogel as being new STC activations, please describe what function those facilities had prior to their use as an STC. If they are brand new facilities please specify that.

APWU/USPS-T1-20 Once their originating mail has been moved to another facility, will each of the ten consolidated facilities identified in Library Reference N2006-1/5 become a Destination Processing Center? If not, please describe what aspects of these facilities prevent them from having that designation.

APWU/USPS-T1-21 On page 10 of your testimony you discuss the role of END and state "...it would be a mistake to say that the END model output will dictate or determine specific outcomes. Those decisions will be made in accordance with the principles and procedures described by witness Williams which take the END model outputs into consideration." Mr. Williams' testimony then describes the AMP process.

- a) Which of the new facilities being created will be determined by the AMP process? Will that only determine LPC/DPC conversions?
- b) Will RDCs be determined by the AMP process or will they be determined by what Mr. Vogel refers to as a "process that blends the principles of AMP with facility planning concepts"?
- c) If RDCs are not being determined by the AMP process, please identify the steps and procedures that are involved in the process to which Mr. Vogel is referring.
- d) Mr. Vogel also refers to RDC conversions as having a "detailed stakeholder communication plan." Please describe that communication plan and identify ways in which it differs for the communication plan that has been described for the AMP process.