

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 WILLIAMS
TO POSTCOM INTERROGATORY POSTCOM/USPS-T1-1
REDIRECTED FROM WITNESS SHAH
(April 21, 2006)

The United States Postal Service hereby submits the response of witness Williams to the following interrogatory of the Association for Postal Commerce: POSTCOM/USPS-T1-1, filed on March 29, 2006. The interrogatory has been redirected from witness Shah to witness Williams for response. The interrogatory is stated verbatim and is 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 POSTCOM INTERROGATORY REDIRECTED FROM WITNESS SHAH**

POSTCOM/USPS-T1-1. Your testimony (at p. 13) explains that the Postal Service anticipates service standard changes affecting particular 3-digit ZIP Code service area origin-destination pairs. In footnote four, you briefly describe Library Reference N2006-1/2, which provides information regarding how the service standards for each mail class currently apply to the matrix of approximately 850,000 3-digit ZIP code origin-destination pairs in the postal network.

- (a) Does the Postal Service have information concerning the service, in terms of the number of days from origin to destination, actually provided or typically provided with respect to each of the 850,000 3-digit ZIP code origin-destination pairs in the postal network for Standard Mail? For Periodicals? If so, please describe this information.
- (b) Please provide a copy of this information for a recent and reasonable reporting period.
- (c) If the Postal Service has such information, will the Postal Service use this information in the course of its post-implementation review to report on whether the service upgrades or downgrades that are anticipated by each of the approved AMP proposals are achieved as planned?
- (d) If the Postal Service does not have such information, how will the Postal Service evaluate service (in terms of number of days from origin to destination) as part of its post-implementation review?

RESPONSE

- (a) No. Not for either.
- (b) N/A
- (c) N/A
- (d) Please review USPS Library Reference N2006-1/3 at pages 11-12. The purpose of the AMP post-implementation review process is to assess the degree to which the planned operational changes have been implemented and are achieving their efficiency objectives. The AMP review process does not establish specific targets for service standard achievement for any mail class. For those classes for which it can be measured

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Response to POSTCOM/USPS-T1-1 (continued):

systematically, evaluation of service standard achievement is a routine management function that has no particular connection to whether a service area has been subjected to a consolidation.