

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

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**Evolutionary Network Development  
Service Changes, 2006**

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**Docket No. N2006-1**

**INTERROGATORIES OF AMERICAN POSTAL WORKERS UNION, AFL-CIO TO  
USPS WITNESS SHAH (APWU/USPS T1-27-30)  
(May 22, 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-T1-27 The following document is from the web site the Postal Service maintains for the purpose of remaining in contact with the MTAC mailers. This particular document can be found at <http://ribbs.usps.gov/mtac.htm> and is called MTACRIBBS.doc:

As per an earlier agreement with MTAC Workgroup, Issue 60, the USPS office of Integrated Network Development will be posting advance notice of planned adjustments to First Class Mail Service Standards under the "File Libraries" link on the RIBBS Home Page (<http://ribbs.usps.gov/>). After clicking-on the "File Libraries" link (<http://ribbs.usps.gov/files/>), then an MTAC user can click-on the **ServiceStandards** link, which will then lead them to a page which will display links to all the files which have been posted in anticipation of First-Class Mail Service Standard changes.

This information is scheduled to be posted 30 days prior to the start of a Postal Quarter. If no Service Standard changes are anticipated, a "No Scheduled Updates" notice will be posted.

If any MTAC member would like to submit comments, or concerns, regarding any announced FCM Service Standard changes posted on this site, please submit your comments, within 10 days of the posting, by clicking-on the following Email link:

Email Comments to [servicestandards@email.usps.gov](mailto:servicestandards@email.usps.gov)

Thank You.

**Integrated Network Development  
May 10, 2002"**

- a) Is the office of Integrated Network Development, mentioned in this document, the subgroup of your office identified in your response to APWU/USPS T1-2 (c)?
- b) What is the role of this office in the END (formerly NIA) process?
- c) This document directs MTAC mailers to submit comments on First Class service standard changes as identified through this process. Are other mailers also allowed to submit comments through this mechanism?
- d) What happens to the comments that are received through this e-mail address?
- e) This document states that this information will be posted 30 days prior to the start of each Postal quarter yet the last posting was made on September 30, 2005. Please explain why these postings have not been updated since then.

APWU/USPS-T1-28 In your response to VP/USPS-T1-15, you state that there is no system in place for measuring service performance for Standard mail. How will your office and other management teams assess whether changes made through network realignment have an unacceptable negative impact on those classes of mail without formal performance measures?

APWU/USPS-T1-29 Does the END modeling process use any data that assesses actual service performance for any class of mail or does it only use service standards?

APWU/USPS-T1-30 Please clarify your response to PB/USPS T1-8. Is single-piece in your response a description of a rate category of mail or a physical description of the mail?