

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 OCA INTERROGATORY OCA/USPS-T2-3
(May 23, 2006)

The United States Postal Service hereby submits the response of witness Williams to the following interrogatory of the Office of the Consumer Advocate, filed on March 6, 2006: APWU/USPS-T2-3.

The interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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**RESPONSE OF UNITED STATES POSTAL SERVICE WITNS WILLIAMS
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE**

OCA/USPS-T2-3 Please turn to page 11 of your testimony, where at lines 5-29 you discuss “Procedures for Moving Forward.”

- a. Please explain how a locally-developed alternative network realignment proposal might differ from the END model simulation results and AMP review.
- b. You discuss approvals of changes in the application of service standards of 3-digit ZIP Code pairs. Is there a basis for assigning a monetary value to such changes?
- c. You mention post-implementation review. Please provide any additional information available on the concept of post-implementation review.

RESPONSE

- a. The “locally developed alternative network realignment proposals” referenced there the feasibility studies initiated at the local/District level and conducted as part of the END strategy.
- b. The Postal Service has not explored whether there is any basis for doing so.
- c. Please review pages 10-12 of USPS Library Reference N2006-1/3, the Handbook PO-408.