

**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 T1-31-32)
(May 31, 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-T1-31 Mr. Vogel has indicated in past presentations that there will be a reduction in the number of facilities doing processing and distribution work during the network alignment period and has, at times, provided an approximate number of facilities that will be closed.

- a) Are the END models designed to indicate which facilities should be closed?
- b) If the END model runs indicate that a particular facility would not be assigned mail, is that facility likely to be scheduled for closure?
- c) If the END model runs do not provide an indication as to which facilities should be closed, how is that determination made in the network planning process?

APWU/USPS-T1-32 Library Reference N2006-1/11 shows the AMPs for DuBois, Oil City and Bradford, PA. Since the destinating mail was consolidated for these facilities and they no longer appear on the list the USPS provided in DBP/USPS-14, they seem to be closed. Mr. Williams, in his response to APWU/USPS-T2-46, stated that "Oil City, PA; Bradford, PA; and Du Bois, PA Post Offices were not individually modeled; however, all function 1 workload was included." Please clarify Mr. Williams' answer to APWU/USPS-T2-46 and provide an explanation of how the END models were used with relation to these three facilities and/or the workload associated with them.