

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

EVOLUTIONARY NETWORK DEVELOPMENT)
SERVICE CHANGES)

Docket No. N2006-1

ASSOCIATION OF PRIORITY MAIL USERS, INC.
THIRD INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS TO UNITED STATES POSTAL SERVICE
WITNESS PRANAB M. SHAH (APMU/USPS-T1-6)
(June 2, 2006)

Pursuant to sections 25 and 26 of the Postal Rate Commission rules of practice,
Association of Priority Mail Users, Inc. hereby submits interrogatories and document
production requests. If necessary, please redirect any interrogatory and/or request to a more
appropriate Postal Service witness.

Respectfully submitted,

William J. Olson
John S. Miles
Jeremiah L. Morgan
WILLIAM J. OLSON, P.C.
8180 Greensboro Drive, Suite 1070
McLean, Virginia 22102-3860
(703) 356-5070

Counsel for:
Association of Priority Mail Users, Inc.

APMU/USPS-T1-6.

Please refer to your response to APMU/USPS-T1-2e, where you stated:

The merging of like-shaped products will mostly occur downstream from the destination processing facilities, a point after which the service standards can be considered essentially the same for all mail, except Express Mail which has specific time of day delivery targets. The extent to which other opportunities may be identified as network implementation occurs, these opportunities will be evaluated based on their capability to support the service standards of the class of mail with the more expedited standards involved in the merged mail flow.

- a. Will automatable letter-shaped mail, including Priority Mail, be merged at destination mail processing facilities, or will it be merged downstream from destination mail processing facilities?
- b. Please refer to the testimony of witness Joyce K. Coombs (USPS-T-44) in Docket No. R2006-1, and her discussion of the Flat Sequencing System (“FSS”) at pages 7-8.
 - (i) Will flat-shaped Priority Mail be sorted to carrier-route using the FSS? If so, will flat-shaped Priority Mail be merged at destination mail processing facilities or downstream from destination mail processing facilities?
 - (ii) If it will not be handled on the FSS, how will flat-shaped Priority Mail be handled at destination mail processing facilities?