

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

EVOLUTIONARY NETWORK DEVELOPMENT  
SERVICE CHANGES, 2006

Docket No. N2006-1

RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS WILLIAMS  
TO POSTCOM INTERROGATORIES  
REDIRECTED FROM WITNESS SHAH  
(POSTCOM/USPS-T1-9, 10 AND 16)  
(June 6, 2006)

The United States Postal Service hereby submits the responses of witness Williams to the following interrogatories of POSTCOM, filed on May 19, 2006: POSTCOM/USPS-T1-9, 10 and 16. The interrogatories have been redirected from witness Shah to witness Williams for response. Each interrogatory is stated verbatim and 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 INTERROGATORY OF POSTCOM  
REDIRECTED FROM POSTAL SERVICE WITNESS SHAH**

**POSTCOM/USPS-T1-9.** How have the avoided costs that may result from the consolidations that occur between FY2005 and FY2008 (inclusive) as a result of Evolutionary Network Design and AMP consolidations that are implemented during these years been estimated? Please identify any documents that estimate and/or reflect these avoided costs.

**RESPONSE:**

Because of the unique nature of each AMP, no aggregate savings projection has been developed.

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**POSTCOM/USPS-T1-10.** Please provide copies of any documents identified in response to POSTCOM/USPS-T1-9.

**RESPONSE:**

See the response to POSTCOM/USPS-T1-9. Estimated annual savings for the eleven AMPs implemented in 2005 are reflected in the individual AMP packages in USPS Library References N2006-1/5 and N2006-1/6.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS WILLIAMS  
TO INTERROGATORY OF POSTCOM  
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**POSTCOM/USPS-T1-16.** Please indicate whether and when mailers that enter significant destination entry volumes at facilities that may be affected by proposed AMP consolidations will be consulted before a final decision is made regarding the AMP proposal. Prior to a final decision, will these mailers be asked for input to perform a "reality-check" on the simulated volumes and timing of arrival of these volumes at the proposed, consolidated facility that are generated from the END model? If not, why not?

**RESPONSE:**

Mailers will be notified regarding the AMP study impacts in accordance with the AMP Communications Plan. No process has been established for identifying specific mailers to be invited to provide "reality checks" before final decisions are made.