

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 SHAH
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE
(OCA/USPS-T1-13)
(June 6, 2006)

The United States Postal Service hereby submits the response of witness Shah to the following interrogatory of the Office of the Consumer Advocate, filed on March 9, 2006: OCA/USPS-T1-13. The 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 SHAH
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE**

OCA/USPS-T1-13. In your discussion of the Evolutionary Network Development (END) model, you mention the model as using “computer simulations as a tool in the development of more efficient and flexible mail processing and transportation networks that are better suited to current and future postal needs”. At page 7, lines 6-8.

- a. Please describe the types of equipment, facility, and processing changes or modifications which you view as necessary to obtain “more efficiency and flexible mail processing and transportation...” in implementing the results of a restructuring study.
- b. Please furnish a case study of the application of the model, including computer inputs, outputs, assumptions, and conclusions.
- c. Please furnish the model and any instructions necessary to duplicate the work identified in (b) of this question.
- d. Please explain the effects, if any, on service standards.

RESPONSE:

- (a) The END project leverages the existing and planned capabilities of automation technology to achieve better economies of scale for the postal mail processing and transportation network. Where necessary, the END models recommend the need to invest in new facility infrastructure based on future network requirements.
- (b) Please review the case study reflected in the last several slides in USPS Library Reference N2006-1/9.
- (c) A detailed description of the simulation model inputs was provided in response to Question 15 of Presiding Officer’s Information Request No. 2. A detailed description of how they are utilized is reflected in USPS Library Reference No. N2006-1/9.

RESPONSE TO OCA/USPS-13 (continued):

- (d) The END models attempt to maintain existing service standards to the greatest extent possible, however, there will be instances where the model will recommend changing current service standards to achieve an optimal network national solution. Any such changes to existing services standards are evaluated as part of individual AMPs.