

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

EVOLUTIONARY NETWORK DEVELOPMENT
SERVICE CHANGES, 2006

Docket No. N2006-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO PITNEY BOWES INTERROGATORY
(PB/USPS-6)

The United States Postal Service hereby files its response to the following interrogatory of Pitney Bowes, dated April 19, 2006: PB/USPS-6. The interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF PITNEY BOWES**

PB/USPS-6

Please provide a list of all facilities at which the Postal Service performs delivery point sequencing.

RESPONSE

It is understood that the supposed impetus for this interrogatory is the perception that disclosure of such a list could help one to determine which facilities in the current postal network might end up serving as Destinating Processing Centers in the future postal network. Such a perception is misguided. In addition to being performed at numerous subordinate Destination Delivery Units, delivery point sequencing is performed at all current Processing and Distribution Centers/Facilities. Those P&DC/Fs that do not evolve into Regional Distribution Centers or have their entire operations consolidated into other facilities are expected to serve as either Local Processing Centers or Destinating Processing Centers in the future network. An LPC will perform both originating and destinating processing. By deduction, the role of a DPC is self-explanatory. Both types of facilities can be expected to perform DPS. Knowing that a particular DDU currently performs DPS does not ensure that that DDU will perform that function in the future. The fact that a particular P&DC/F (or one or more of its subordinate DDUs) currently performs DPS, by itself, is not determinative of whether that P&DC/F -- should it have a role in the future network -- will be either an LPC or a DPC. In any event, whether it is an LPC or a DPC, odds are that it will perform DPS. A list of facilities currently performing DPS is just that -- a list of facilities performing DPS. It is of no value in predicting which facilities will be designated as DPCs.