

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 ASSOCIATION OF PRIORITY MAIL USERS INTERROGATORY
(APMU/USPS-T1-6)
(June 23, 2006)

The United States Postal Service hereby submits the response of witness Shah to the following interrogatory of the Association of Priority Mail Users, filed on June 2, 2006: APMU/USPS-T1-6. The interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS SHAH
TO INTEROGATORY OF THE ASSOCIATION OF PRIORITY MAIL USERS**

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?

RESPONSE

- a. The merger of multiple classes will only occur at a point in the mail stream where the service commitments from that point to delivery are the same.
- b(i)-(ii). I am informed that we are still working out the details, and that it is too early to know.