

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

EVOLUTIONARY NETWORK DEVELOPMENT
SERVICE CHANGES, 2006

Docket No. N2006-1

OBJECTIONS OF THE UNITED STATES POSTAL SERVICE
TO ASSOCIATION OF PRIORITY MAIL USERS INTERROGATORIES
(APMU/USPS-T1-7(a), (b), (c), (d), AND (f))
(June 27, 2006)

The United States Postal Service hereby files its objection to the following interrogatories directed by the Association of Priority Mail Users to witness Shah on June 16, 2006: APMU/USPS-T1-7(a), (b), (c), (d), and (f). In whole or in part, each of these questions seeks information that is irrelevant to the issues raised by the request in this docket.

This proceeding was initiated by a request for an advisory opinion under § 3661 on changes in the application of current service standards to postal services that may result from Evolutionary Network Development, an network realignment initiative which seeks to consolidate postal mail processing operations to improve efficiency. Instead of seeking information relevant to the issues raised by the Postal Service's request, these subparts of APMU/USPS-T1-7, to varying degrees, seek information pertaining to Priority Mail processing changes that were made in the early 1990's and that have since been negated by subsequent operational changes.

The establishment and de-commissioning of Priority Mail Processing Centers is irrelevant to the current docket. PMPCs were intended to *supplement* the then-existing network. In contrast, the END initiative seeks to *consolidate* the currently existing

network. The fact that both programs involve network *changes* does not make one relevant to the other. If APMU believes that the Priority Mail Processing Center concept had some adverse impact on Priority Mail costs and rates, APMU had ample opportunity to explore those concerns and related issues in numerous dockets before the Commission during which the PMPC concept was in operation.

The history of the PMPC concept has no bearing on whether the END initiative will produce changes in postal services that are consistent with the policies of the Postal Reorganization Act. Accordingly, the Postal Service objects to these interrogatories.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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