

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

EVOLUTIONARY NETWORK DEVELOPMENT
SERVICE CHANGES, 2006

Docket No. N2006-1

REVISED RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS SHAH
TO APWU INTERROGATORIES APWU/USPS-T1-19 AND 21
(July 11, 2006) [ERRATA]

The United States Postal Service hereby submits the revised responses of witness Pranab Shah to the following interrogatories of the American Postal Workers Union: APWU/USPS-T1-19 and 21. The original responses were filed on May 8, 2006. The revised responses correct typographical errors in the responses to T1-19(b) and T2-21(a), and correct a formatting error in the response to T-21(c). There are no substantive changes in the responses.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux
Chief Counsel, Ratemaking

Michael T. Tidwell

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2998; Fax -5402
michael.t.tidwell@usps.gov

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS SHAH
TO INTERROGATORIES OF THE AMERICAN POSTAL WORKERS UNION
Revised: July 11, 2006**

APWU/USPS-T1-19 In response to APWU/USPS-T1-6(c) and (d) you stated that all RDCs would become Surface Transfer Centers but could not provide a list of facilities that would become STCs because it had not been determined yet. In his presentation to MTAC on February 22, 2006, Mr. Vogel identified six new Surface Transfer Center Activations during 2006 (three to be activated on April 22, 2006, one to be activated on August 5, 2006 and two to be activated on October 30, 2006). In addition, Mr. Vogel indicated that fifteen HASP locations would become Surface Transfer Centers this year.

a) Have any facilities other than the ones identified by Mr. Vogel in his MTAC presentation, already been identified as Surface Transfer Centers? If so, please identify those facilities.

b) Of the six facilities identified by Mr. Vogel as being new STC activations, please describe what function those facilities had prior to their use as an STC. If they are brand new facilities please specify that.

RESPONSE:

- a. No.
- b. Three are new facilities; the other three are existing USPS facilities (a mail processing annex, a Logistics & Distribution Center, and a Bulk Mail Center) in which the new STC role will be housed.

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APWU/USPS-T1-21 On page 10 of your testimony you discuss the role of END and state "...it would be a mistake to say that the END model output will dictate or determine specific outcomes. Those decisions will be made in accordance with the principles and procedures described by witness Williams which take the END model outputs into consideration." Mr. Williams' testimony then describes the AMP process.

- a) Which of the new facilities being created will be determined by the AMP process? Will that only determine LPC/DPC conversions?
- b) Will RDCs be determined by the AMP process or will they be determined by what Mr. Vogel refers to as a "process that blends the principles of AMP with facility planning concepts"?
- c) If RDCs are not being determined by the AMP process, please identify the steps and procedures that are involved in the process to which Mr. Vogel is referring.
- d) Mr. Vogel also refers to RDC conversions as having a "detailed stakeholder communication plan." Please describe that communication plan and identify ways in which it differs for the communication plan that has been described for the AMP process.

RESPONSE:

- a) When the consolidation of all originating and/or destinating mail is required to affect the future role of a plant as an LPC or DPC, the AMP process will be utilized.
- b) An RDC planning concept document which blends the principles of AMP with facility planning concepts is being developed.
- c) The individual RDC concepts are based on END modeling output with refinement from operations subject matter experts. I am informed that the RDC planning concept document will include worksheets which, similar to the AMP worksheets, will contain an executive summary, provide for management concurrence, service information, workload/workhour data, mail processing equipment set, distribution changes, surface and air transportation impacts, etc.

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RESPONSE to APWU/USPS-T1-21 (continued)

- d) Each RDC activation will present a unique set of communications challenges both internally and externally related to transitional activities over time. I am informed that an RDC Activation Communication Plan is under development will identify communications efforts required to support the initiation, development, and activation of an individual RDC, and of the RDC network as a whole. The AMP Communications plan focuses on specific communication requirements per the PO-408 Handbook AMP Guidelines, for notification of AMP Study initiation and outcome, to Worksheet #3 stakeholders for each individual AMP.