

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

**Evolutionary Network Development
Service Changes, 2006**

Docket No. N2006-1

**AMERICAN POSTAL WORKERS UNION, AFL-CIO, DESIGNATION OF
WRITTEN CROSS-EXAMINATION OF UNITED STATES POSTAL SERVICE
WITNESS DAVID E. WILLIAMS
(July 13, 2006)**

Pursuant to the Presiding Officer's Ruling N2006-1/26 of July 12, 2006, and Rule 30(e)(2) of the Commission's Rules of Practice, the American Postal Workers Union, AFL-CIO (APWU) hereby designates the following interrogatory responses of United States Postal Service witness David E. Williams (USPS-T-2) as the written cross-examination of the APWU to be included in the record of this proceeding:

APWU/USPS-T2-4, 5, 7, 8, 12, 13, 14, 15, 16, 17, 18, 19, 22, 26, 31, 35, 40, 41, 48, 50, 53, 57, 79, 80, 81, 82, 83, 86, 87, 88, 89, 99, 101, 102, 103, 104, 106, 107, 108, 109, 110, 111, 112

APWU/USPS-T2-1 (revised July 10, 2006)

APWU/USPS-T2-3 (revised May 8, 2006)

APWU/USPS-T2-6 (revised April 18, 2006)

APWU/USPS-T2-55 (revised July 11, 2006)

APWU/USPS-T2-60, 61, 62, 63 (revised July 10, 2006)

APWU/USPS-T2-64, 66, 69, 70, 74 (revised July 11, 2006)

APWU/USPS-T2-100 (revised July 10, 2006)

APWU/USPS-T1-5 (redirected to Williams)

POSTCOM/USPS-T2-4, 6, 11, 12, 13

POSTCOM/USPS-T1-16 (redirected to Williams)

NNA/USPS-T2-7, 11, 12,13, 15

VP/USPS-T2-5

Respectfully submitted,

Darryl J. Anderson
Counsel for American Postal Workers Union, AFL-CIO

O'Donnell, Schwartz & Anderson, P.C.
1300 L Street NW Suite 1200
Washington, DC 20005-4126
Voice: (202) 898-1707
Fax: (202) 682-9276
DAnderson@odsalaw.com