

**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, COMMENTS ON
PROCEDURAL SCHEDULE FOR REMAINDER OF CASE
(July 26, 2006)**

Pursuant to Presiding Officer's Ruling N2006-1/29 of July 19, 2006, The American Postal Workers Union (APWU) hereby provides comments on the remainder of the procedural schedule in this proceeding.

On July 21, 2006, the APWU filed its Notice of Intent to File Testimony in the current proceeding indicating that it would need until at least August 18th to prepare and file its testimony. However, at this time discovery on the Postal Service's case is still ongoing. The APWU cannot and should not be required to submit its direct case until the Postal Service has satisfied all outstanding discovery requests and the participants have been given a reasonable period of time to conduct discovery and follow-up. The Postal Service has still not filed all of the outstanding discovery relating to its END process, most significantly the RDC documentation. Given the obvious import of these documents to the END process the APWU believes that it would be seriously disadvantaged if it were required to file testimony in the absence of meaningful discovery regarding the RDC documentation. Therefore, the APWU requests that it be given at least 2-3 weeks to conduct discovery on the RDC documents and other outstanding materials once they have been submitted. The APWU also requests that at the conclusion of this discovery period it then be given a minimum of 4 weeks to complete and file its testimony.

Respectfully submitted,

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