

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

Postal Rate and Fee Changes, 2006

Docket No. R2006-1

**FOLLOW UP INTERROGATORIES OF AMERICAN POSTAL
WORKERS UNION, AFL-CIO, TO USPS WITNESS MARC D. McCRERY
(APWU/USPS-T42-22)
(August 23, 2006)**

Pursuant to Rules 25, 26, and 27 of the Rules of Practice, the American Postal Workers Union, AFL-CIO directs the following follow-up interrogatory to USPS witness Marc D. McCrery. If the witness is unable to respond to any interrogatory, APWU requests that a response be provided by an appropriate person capable of providing an answer.

Respectfully submitted,

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APWU/USPS-T42-22 In response to a discussion about the 19,300 zip codes for which no delivery point sequencing is done, you were asked if a list of those zip codes is available. You indicated those would be listed in the Postal Service's City/State Product (see transcript Volume 11 at 3303-3304). A call to customer service at Address Information Service (the only reference to a City/State Product that we were able to find) did not provide the needed list of zip codes nor clear information about how to get this zip code list. In fact, customer service asked us to please define what we meant by delivery point sequencing. The documentation on the web of the City/State Product also does not mention such a list nor does it clearly define an indicator within the datasets that could be used to generate such a list.

- a) We would request that the Postal Service please provide us with a list of zip codes where delivery point sequencing is not performed, preferably in either an electronic worksheet format or an ascii format.
- b) Please confirm that any zip code not on this list could be assumed to be delivery point sequenced.