

Before the
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

Evolutionary Network Development)
Service Changes, 2006)

Docket No. N2006-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS PRANAB M. SHAH (OCA/USPS-T1-4-9)
March 8, 2006

Pursuant to Rules 25 through 28 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA interrogatories OCA/USPS-1-5, dated March 3, 2006, are hereby incorporated by reference.

Respectfully submitted,

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Officer of the Commission

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OCA/USPS-T1-4. Please explain specifically and separately, how END was used in the process of deciding to consolidate each of ten facilities contained in USPS-LR-N2006-1/5: Pasadena, CA P & DC; Olympia, WA P & DF; Waterbury, CT P & DF; Bridgeport, CT P & DC; Greensburg, PA Post Office; Monmouth, NJ P & DC; Northwest Boston, MA P & DC; Kinston, NC P & DF; Marysville, CA P & DF; Mojave, CA Post Office. Provide all of the documentation reflecting END was used in the Decision making process for each of the ten facilities listed above.

OCA/USPS-T1-5. The USPS Transformation Plan Progress Report, November 2004 at page 9, states:

Efforts to create a flexible logistics network to reduce costs, increase overall operational effectiveness, and improve consistency of service, formerly called Network Integration and Alignment, continues as an evolutionary process. This effort, now more accurately called Evolutionary Network Development, currently focuses on a proposed bulk mail center (BMC) retrofit transition effort.

- a. Does the Network Integration and Alignment (NIA) process continue to function? If so, please explain how it differs from the END strategy. Please confirm that the description of the NIA presented above shares the same objectives and policies you describe about the END strategy at page 1 of your testimony. If you do not confirm, then please explain fully any differences between END and NIA.
- b. If END is essentially a new incarnation of NIA, then what significance is there in describing the overall effort as an “Evolutionary Network Development” strategy as opposed to a “Network Integration and Alignment?”
- c. If NIA still exists, what activities are currently being performed under NIA?

OCA/USPS-T1-6. At page 2 of your testimony, you refer to the mail distribution system as a “series of overlapping, single-product networks.” Please list each distinct single-product network to which you refer.

OCA/USPS-T1-7. Please refer to your testimony at page 3, lines 1-2.

- a. What kind of facility is a “distribution center for Periodicals?”
- b. How many such Periodicals distribution centers are active across the United States?
- c. Please provide a listing of the locations of the Periodicals distribution centers.

OCA/USPS-T1-8. At page 2 of your testimony, you mention 450 facilities that process and transport mail. Please break down that figure (450) into the number of:

- a. Processing and Distribution Centers (P & DCs)
- b. Logistics and Distribution Centers (L & DCs)
- c. Hub and Spoke Program facilities (HASPs)
- d. Airport Mail Centers (AMCs)
- e. Area Distribution Centers (ADCs)
- f. Automated Area Distribution Centers (AADCs)
- g. Bulk Mail Centers (BMCs)
- h. Other types of facilities (list each discrete type)
- i. Are remote encoding centers (RECs) included within the 450-facility figure?
- j. What is the number of RECs?

- k. Is the phrase “Sectional Center Facility (SCF)” still used by the Postal Service? If so, please explain how the SCF label fits in with the types of facilities you picture in Figure 1 on page 3 of your testimony.
- l. Throughout Library Reference LR-N2006-1/5, facilities are sometimes referred to as P & DCs and at other times as P & DFs. What is the difference between a P & DC and a P & DF?
- m. Please identify/describe the differences among P & DCs, P & DFs, L & DCs, ADCs, and AADCs.

OCA/USPS-T1-9. The following refers to your response to APWU/USPS-T1-3[c].

- a. Please explain what the acronym PSFR refers to. Include in your response a description of the types of data contained in the PSFR data source and provide a sample copy of the report.
- b. Please explain what the acronym EOR refers to. Include in your response a description of the types of data contained in the EOR data source and provide a sample copy of the report.
- c. Please explain what the acronym TIMES refers to. Include in your response a description of the types of data contained in the TIMES data source and provide a sample copy of the report.
- d. Please provide a copy of the reports generated by PC Miler for each of the ten sites specified in this docket.
- e. Please provide the most recent copy of the Service Standard Directory you are referring to in your response.