

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

EVOLUTIONARY NETWORK DEVELOPMENT  
SERVICE CHANGES, 2006

Docket No. N2006-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE  
REDIRECTED FROM WITNESS SHAH (OCA/USPS-T1-22)

The United States Postal Service hereby submits its responses to the following interrogatory of the Office of the Consumer Advocate, filed on April 5, 2006: OCA/USPS-T1-22. The interrogatory has been redirected from witness Shah to the Postal Service for response. The interrogatory is stated verbatim and followed by the response.

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  
May 22, 2006

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE  
REDIRECTED FROM WITNESS SHAH**

**OCA/USPS-T1-22.** Has the Postal Service used CONFIRM data in the analysis of the 10 consolidations identified in USPS-LR-N2006-1/5?

- a. If your response to the interrogatory is affirmative, please identify: (1) when the data was used; (2) what data was used; and (3) how the data was used.
- b. If your response to the interrogatory is other than affirmative, please explain why CONFIRM data was not used.

**RESPONSE**

Not as part of the development or implementation of the consolidation proposals.

- (a) N/A
- (b) It is not clear how CONFIRM data would have been useful in determining the feasibility of those particular operational consolidation proposals or in their implementation.