

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-T1-17-20)  
March 21, 2006

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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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OCA/USPS-T1-17. Please refer to the response to interrogatory DBP/USPS-28. The response states: “[I]t is expected that the domestic (excluding military mail) service standards for Periodicals will either be equal to, or slower than, the service standards for First-Class Mail.” The implication of this statement is that, for many ZIP Code pairs, Periodicals Mail may have the same service standards as First Class Mail.

a. In light of the response, please state why the worksheets provided in USPS Library Reference N2006-1/5 generally do not state whether there will be degradation in Periodicals Mail service standards.

b. For each of the facilities referenced in LR-2006-1/5, both losing and receiving operations, were the service standards for Periodicals Mail reviewed to determine if service between any ZIP Code pairs would be degraded?

i. If so, please provide the results of that review; and please provide the ZIP Code pair changes in Periodicals Mail service standards.

ii. If not, please explain why there was no review of the impact on Periodicals Mail service standards.

OCA/USPS-T1-18. For each of the 10 facilities transferring some mail processing operations included in Library Reference USPS-LR-N2006-1/5, please state whether the facility included a Business Mail Entry Unit (BMEU) prior to the consolidation.

a. Will any BMEUs be closed as a result of the 10 AMP consolidations?

b. Following consolidation, of those BMEUs remaining open in a facility that is transferring some mail processing operations, will mailers be permitted to tender all

classes of mail at each of those BMEUs, including First Class and Priority Mail? If not, please explain why not?

d. For any BMEUs that will be closed as a result of the 10 consolidations, please confirm that mailers located near the closing facility may have to transport their mail over greater distances to the gaining facility.

i. If you do confirm, please explain why the AMP procedure does not specifically include an evaluation of this impact?

ii. If you do not confirm, please fully explain.

iii. What notification is provided to mailers about the closing of any BMEUs as a result of consolidations? Please provide an example of a notification.

iv. How much advance notice is provided to mailers prior to the closing of any BMEUs as a result of consolidations?

OCA/USPS-T1-19. Please confirm that on February 8, 2006, the Postal Service issued News Release No. 06-008, that included the announcement: "The Board approved the redirection of funds toward the development and testing of a Flats Sequencing System (FSS) which will allow the sequencing of larger mail pieces in delivery point order."

a. If you are unable to confirm the News Release, please explain.

b. Please indicate whether or not the results of the testing of the FSS will impact consolidations.

OCA/USPS-T1-20. The Greensburg, Pennsylvania Post Office is one of the facilities whose originating operations will be consolidated into a Processing and Distribution

Center (P&DC - Pittsburgh). What is the number of post offices that are potential candidates for some consolidation into a P&DC ?