

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-T1-21-22)
April 5, 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-T1-21. At pages 9-10 of your testimony, you briefly describe the optimization models used in the Evolutionary Network Development (END) process which continues as an evolutionary process the Network Integration and Alignment program as discussed in OCA/USPS-T1-5. Please provide a complete mathematical description for each type of optimization model, including the following items:

- a. Specify and briefly define each constant or variable used in the model, using mathematical notation as necessary (e.g., V_{ijk} might be the volume of class i mail originating in area j and destined for area k). For each variable (or set of similar variables), specify: a) whether it is used as an input variable, a decision variable, or an output variable; b) whether the variable is discrete or continuous; and c) what range of values the variable can take.
- b. Specify the objective function to be optimized by the model, in equation format (using the variables and constants defined above).
- c. Specify the constraints used in the model, as equations and/or inequalities (using the variables and constants defined above).
- d. Specify the mathematical method used to find the optimal solution (e.g., linear programming, integer programming) and provide a reference for that method in the technical literature.

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.