

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

EVOLUTIONARY NETWORK DEVELOPMENT
SERVICE CHANGES, 2006

Docket No. N2006-1

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS SHAH
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE
(OCA/USPS-T1-10)
(April 10, 2006)

The United States Postal Service hereby submits the response of witness Shah to the following interrogatory of the OCA filed on March 9, 2006: OCA/USPS-T1-10.

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
April 10, 2006
michael.t.tidwell@usps.gov

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

OCA/USPS-T1-10

Please turn to your testimony at page 5, Figure 2, where you illustrate the current network complexities, and your testimony at page 12, Figure 3, Network Simplification. It is our understanding that in addressing network redesign the Postal Service is attempting to move from the type of situation portrayed in Figure 2 to a simplified network as portrayed in Figure 3. Please confirm this understanding. If you do not confirm, please explain your response in detail.

RESPONSE

As with the current network, the future network is not expected to resemble a mosaic of identical facility clusters. It is confirmed that Figure 3 is intended to reflect the types of facilities and functions that will populate the future network.