

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

EVOLUTIONARY NETWORK DEVELOPMENT  
SERVICE CHANGES, 2006

Docket No. N2006-1

RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS SHAH  
TO PITNEY BOWES INTERROGATORIES (PB/USPS-T1-7 AND 8)  
(May 8, 2006)

The United States Postal Service hereby submits the responses of witness Shah to the following interrogatories of Pitney Bowes, filed on April 19, 2006: PB/USPS-T1-7 and 8. Each interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux  
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**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS SHAH  
TO INTERROGATORIES OF PITNEY BOWES**

**PB/USPS T1-7** Please confirm that in today's network delivery point sequencing of letters is generally performed at destination sectional center facilities ("DSCF"). If not confirmed, please explain fully the classification of facility where DPS is generally performed in today's network.

**RESPONSE:**

Confirmed.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS SHAH  
TO INTERROGATORIES OF PITNEY BOWES**

**PB/USPS T1-8** Please confirm that in the future END network delivery point sequencing of letters is expected to be performed at local processing centers. If not confirmed, please explain fully the classification of facility where USPS expects to perform DPS in the future network.

**RESPONSE:**

No. DPS will be performed at both Local Processing Centers (LPCs) and Destination Processing Centers (DPCs). DPCs will be dedicated incoming mail processing facilities for single-piece letters and flats, LPCs will perform both outgoing and incoming mail processing for single-piece letters and flats.