

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

Evolutionary Network Development
Service Changes, 2006

Docket No. N2006-1

**INTERROGATORIES OF AMERICAN POSTAL WORKERS UNION, AFL-CIO TO
USPS WITNESS SHAH (APWU/USPS T1-22-26)
(May 10, 2006)**

Pursuant to Rules 25, 26, and 27 of the Rules of Practice, The American Postal Workers Union, AFL-CIO directs the following interrogatories to USPS witness Pranab M. Shah. If the witness is unable to respond to any interrogatory, APWU requests that a response be provided by an appropriate person capable of providing an answer

Three APWU interrogatories to witness Shah were misnumbered and errata, filed on May 3, changed questions T1-19-21 to T1-12-14. However, when the Postal Service answered those interrogatories on May 8, it used the original numbers. Consequently, the answers to questions T1-19-21 are actually answers to questions T1-12-14. The PRC has requested that numbers 15-18 now be skipped. Thus, this set of interrogatories begins with question 22.

Respectfully submitted,

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APWU/USPS-T1-22. With reference to the new NE Michigan facility and the new Oklahoma City facility recently approved by the Postal Board of Governors:

- a) Will both of those facilities be Postal owned? If not, why not?
- b) Will those facilities be built to a standardized footprint(s)?
- c) If so, is there an existing Postal facility or facilities that will be used as a model for that standardization?
- d) Please identify facilities that are used as such standardized models.
- e) If these facilities are not being built to a standardized footprint why not?

APWU/USPS-T1-23. In general, how are facilities that have not yet been constructed handled in the context of the END models? Please include in your response not only the new processing facilities such as those mentioned above but also new Surface Transfer Centers and other types of facilities.

- a) How is the facility specific data such as volume, zip code assignments, workroom and platform square footage, workload and productivity and capacity determined and assigned in the model?
- b) Does the distribution concept used in the END models already make the assumption that these facilities will exist in a specific location or is there a process whereby the model indicates the need for a facility in a specific location?

APWU/USPS-T1-24. To clarify your response to APWU/USPS-T1-19 (b), you state that three of the new Surface Transfer Centers identified by Mr. Vogel are new facilities:

- a) Are those facilities newly built by the Postal Service?
- b) If so, are those facilities built using a standardized footprint for such facilities?
- c) If these facilities are not newly built facilities, are they newly leased facilities? If so, will they be renovated to a standardized footprint?
- d) If these facilities are not newly built or newly leased please indicate in what way they are new to the Postal Service network.

APWU/USPS-T1-25. In your response to APWU/USPS-T1-21 please clarify the following:

- a) Is there a currently used “RDC planning concept document” or is this document only in the planning stages now?
- b) Is this planning concept document primarily going to be used to plan the transition of a facility to an RDC facility after it has been decided that a facility will become an RDC or does it incorporate the process by which a decision is made about whether a facility should become an RDC?
- c) If it is the decision-making process and it is only now being developed, how have the RDCs that are already identified been determined?
- d) You refer to an “RDC Activation Communications Plan” that is currently under development. Will that plan be part of the Postal Service’s recently announced “Public Input Process” communications plan (PIP) or are these separate communications plans?

APWU/USPS-T1-26. Have the USPS’ Postal Customer Councils been asked to provide input into the network plan in general? Are the Councils in cities where changes are planned been notified of those changes and their input sought?