

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

EVOLUTIONARY NETWORK DEVELOPMENT )  
SERVICE CHANGES )

Docket No. N2006-1

ASSOCIATION OF PRIORITY MAIL USERS, INC.  
SECOND INTERROGATORIES AND REQUESTS FOR  
PRODUCTION OF DOCUMENTS TO UNITED STATES POSTAL SERVICE  
WITNESS PRANAB M. SHAH (APMU/USPS-T1-5)  
(May 12, 2006)

Pursuant to sections 25 and 26 of the Postal Rate Commission rules of practice,  
Association of Priority Mail Users, Inc. hereby submits interrogatories and document  
production requests. If necessary, please redirect any interrogatory and/or request to a more  
appropriate Postal Service witness.

Respectfully submitted,

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**APMU/USPS-T1-5.**

Please refer to your response to OCA/USPS-T1-12d, where you state that “[o]ne could expect to see somewhere in the neighborhood of 70 Regional Distribution Centers, each connected to its own cluster of some or most of the other facility types identified in Figure 3.”

Also, please refer to your response to APMU/USPS-T1-1a, where you state that “[s]ervice standards for Package Services mail are based on BMC area boundaries. It is safe to assume that most AMPs will not result in BMC service area changes. Accordingly, it is not expected that there will be many changes here either.”

In addition, please refer to the Attachment to your testimony, page 4, Package Services, the paragraph including the statement that “[t]he standards [for Package Services] are therefore predicated on the current BMC network.”

- a. Please confirm that the Postal Service currently has 21 BMCs. If you do not confirm, please provide the correct number.
- b. Please confirm that the Postal Service views the AMP consolidations as part of its evolutionary network development. If you do not confirm, please explain the role, if any, of such consolidations in the evolutionary network development as you envision it.
- c. Please confirm that END envisions most or all of the existing BMCs evolving into RDCs, and being among the 70 or so RDCs discussed in your response to OCA/USPS-T1-12d. If you do not confirm, please describe the future role of the existing BMCs in the postal network.

- d. If the existing 21 or so BMCs, whose service areas now cover almost the entire country, evolve into part of the future network of approximately 70 RDCs, please explain why you expect no service area changes for BMCs after they become part of the network of 70 RDCs.
- e. Please explain how you plan to do away with the BMC network while keeping in place the service standards for Package Services, which you state are based on the BMC network.