

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-T1-23-28)  
May 17, 2006

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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-T1-23. Please confirm that the consolidation of various facilities such as BMCs and HASPs into approximately 70 RDCs will be nationwide in scope. If not, please explain.

OCA/USPS-T1-24. Please refer to your response to your testimony at page 11 stating, "RDCs will consolidate parcel and bundle distribution to take advantage of shape-based efficiencies." Please also refer to your response to APMU/USPS-T1-1a stating that "[s]ervice standards for Package Service mail are based on BMC area boundaries." Please confirm that the consolidation of various facilities such as BMCs, and HASPs into approximately 70 RDCs will impact services for various classes of mail, for instance, package services. If not, please explain.

OCA/USPS-T1-25. Please refer to the response to APWU/USPS-T1-21 which discusses the future RDC conversion process and indicates that, "An RDC planning concept document which blends the principles of AMP with facility planning concepts is being developed."

- a. Please confirm that the RDC planning document will differ from the AMP documents included in LR-N2006-1/5.
- b. Please confirm that the AMP process is used in connection with END to consolidate the originating and/or destinating mail processing at plants which will be LPCs (local processing centers) or DPCs (destination processing centers).

- c. Please confirm that the RDC planning concept document will be used to study the consolidation of facilities such as BMCs and HASPs in a particular region after implementing outgoing mail consolidations, using the AMP process, at the originating and/or destinating mail processing facilities in that same region. If you do not confirm, please explain.
- d. When will the RDC planning concept document blending the principles of AMP with facility planning concepts be completed and ready for application?
- e. When will the RDC Activation Communication Plan now under development be completed and ready for implementation?
- f. Please explain when the Postal Service plans to apply for the first time the RDC planning concept document.
- g. When completed, please provide samples of the RDC planning concept document and the completed RDC Activation Communication Plan.

OCA/USPS-T1-26. Please refer to your responses to APWU/USPS-T1-6c indicating that all RDCs in the future will act as Surface Transfer Centers (STCs) and that transportation consolidation is a fundamental role of an RDC. Also, please refer to the interrogatory APWU/USPS-T1-19 indicating three new STCs were to be activated on April 22, 2006.

- a. Have those STCs been activated? If so, when. If not, please explain.
- b. Are any of these activated STCs now considered RDCs? Please explain.

- c. If the three new STCs are considered to be RDCs, please explain how the Postal Service was able to determine their feasibility as RDCs without using a document like the RDC planning document still under development.

OCA/USPS-T1-27. Please provide a sample copy of the output produced from a run of the END optimization model that led to one of the plant consolidations listed in either USPS-LR-N2006-1/5 or USPS-LR-N2006-1/6. If a sample copy of one of those runs is unavailable, please provide a sample copy of a current run of the optimization model. Include in your response a description of the outputs. All names and/or identifying characteristics may be redacted.

OCA/USPS-T1-28. Please provide a sample copy of the output produced from a run of the END simulation model that led to one of the plant consolidations listed in either USPS-LR-N2006-1/5 or USPS-LR-N2006-1/6. If a sample copy of one of those runs is unavailable, please provide a sample copy of a current run of the simulation model. Include in your response a description of the outputs. All names and/or identifying characteristics may be redacted.