

**BEFOR THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0111**

**EVOLUTIONARY NETWORK DEVELOPMENT
SERVICE CHANGES, 2006**

Docket No. N 2006-1

**SECOND INTERROGATORIES OF PARCEL SHIPPERS ASSOCIATION
TO
UNITED STATES POSTAL SERVICE (PSA/USPS-2)**

The Parcel Shippers Association (PSA) requests United States Postal Service to respond fully and completely to the following interrogatories and requests for production of documents pursuant to Rules 25 and 26 of the Commission's Rules of Practice and Procedure.

Respectfully submitted,

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PSA/USPS-2. In Docket No. R2006-1, USPS witness McCrery (USPS-T42), at page 34 of his testimony, discusses future network considerations including “shifting much of the allied activities (e.g., bundle sorting, parcel distribution, container breakdown) to Regional Distribution Centers (RDCs) when efficiencies can be realized.” Please also refer to Labeling List L601 and L606.

- (a) Please confirm that the service area for the Dallas BMC includes Destination ZIP Codes 706, 710-712, 718, 730, 731, 733-738, 740, 741, 743-799, 880, and 885. If not confirmed, please provide a corrected list of 3-Digit ZIP Codes in the Dallas BMC service area.
- (b) Once transition to an RDC network is complete, please list the RDC that will service each of the Destination 3-Digit ZIP Codes listed in subpart (a) of this interrogatory.
- (c) Do you believe that the transition to an RDC network in particular or the Postal Service’s Evolutionary Network Development (END) initiative in general will have any effect on the 5-Digit ZIP Codes included in the L606 5-Digit Scheme labeling list? Please explain your response fully.
- (d) In the future END network, will parcel shippers be allowed to enter 5-Digit Scheme pallets at Destination Delivery Units? Please explain your response fully.