

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

EVOLUTIONARY NETWORK DEVELOPMENT
SERVICE CHANGES, 2006

Docket No. N2006-1

RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE
(OCA/USPS-39 AND 40)
(June 5, 2006)

The United States Postal Service hereby submits its responses to the following interrogatories of the Office of the Consumer Advocate: OCA/USPS-39 and 40, filed on May 17, 2006. The interrogatories are stated verbatim and followed by the responses.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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**RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE**

OCA/USPS-39. If the consolidation of major facilities such as BMCs and HASPs and other facilities using the RDC planning document will effectuate a change in the nature of postal services,

- a. Will the Postal Service submit the RDC planning document for review prior to consolidating BMCs and HASPs and other facilities into RDCs prior to the effective date of the proposal pursuant to §3661 of the Postal Reorganization Act?
- b. Please explain when and how the Postal Service will provide the Postal Rate Commission with the RDC planning document for its consideration pursuant to §3661 of the Postal Reorganization Act.

RESPONSE

- a. The document is subject to pending discovery requests in this docket.

The Postal Service expects to file a copy as a Library Reference in this docket shortly after the document has been finalized.
- b. The question presumes that the activation of RDCs will result in changes in postal services on at least a substantially nationwide basis, within the meaning of 39 U.S.C. § 3661, beyond the changes that will result from the consolidation of operations implemented on the basis of Area Mail Processing studies conducted in pursuit of the objectives of Evolutionary Network Development. That aside, see the response to subpart (a).

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OCA/USPS-40. If the RDC planning document under development is part of the END proposal that is the subject of this proceeding, please explain how the Commission can conclude this proceeding and render advice to the Postal Service on the END proposal without the entire proposal being before the Commission, including the RDC planning documents and the RDC Activation Communication Plan?

RESPONSE

Please see the response to OCA/USPS-39. There has been no suggestion by the Postal Service that the Commission not review documents that the Commission determines to be relevant to the request in this proceeding.