

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-T1-29-34)
June 12, 2006

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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OCA/USPS-T1-29. Please refer to your response to OCA/USPS-T1-13. In the response to OCA/USPS-T1-13(a) you state, “Where necessary, the END models recommend the need to invest in new facility infrastructure based on future network requirements.” Please explain the way in which the models “recommend” the need to invest. For instance, do models actually list the optimum facility capacity at a known address for each current location and the processing equipment needed for optimum efficiency at each location, or does the output of the models merely list the optimum network configuration at some unknown location to be determined for optimum efficiency and volumes of the various mail classes that would be processed at that unknown location if the system is optimized, after which management must determine the facility location and the amount of equipment necessary to process the volume of mail “recommended” by the END models?

OCA/USPS-30. Please refer to the response to OCA/USPS-13(d) where you state “there will be instances where the model will recommend changing current service standards to achieve an optimal network.”

- a. Please explain exactly how the output of the model expresses the recommendation to change current service standards. For instance, does the output actually list the new service standards for only those 3-digit ZIP-Code pairs that will be different if the network recommended is implemented or does it list the service standards for all 3-digit ZIP-Code pairs impacted by the analysis, whether or not modified.

- b. Does the model recommend changing current service standards for any class of mail other than First-Class? If so, what other mail classes do the recommendations cover?

OCA/USPS- 31. Please refer to OCA/USPS-T1-27. The interrogatory requested a sample copy of the output produced from a run of the END optimization model that led to one of the consolidations in LR-L-N2006-1/5 or 6 or, if not available, a current run with redactions of names and identifying characteristics. The response, "The output was the identification of the opportunity" does not respond to this interrogatory. It is neither a copy of the output nor the alternative, nor does it provide an understanding of the manner in which the output is presented. That is, what is the output (the exact language) that identifies the opportunity. This follow-up interrogatory is to again request a copy of the output of the optimization model in order to determine the extent of the information available to the Postal Service after running this part of the END model.

OCA/USPS-32. Please refer to the response to APWU/USPS-T1-23. The response indicated new facilities not yet constructed "are not handled in the context of the END models."

- a. Please explain the meaning of one sentence of the response, "The model takes existing infrastructure points to specific location and quantities based on workload."

- b. Please confirm that the END model will not provide detailed guidance necessary for determining the locations of new RDC facilities not yet constructed.
- c. Please confirm that a computer model different from the END model, if any, will be utilized to determine the location, size and other characteristics of RDCs not yet constructed.

OCA/USPS-33. Please refer to your response to APWU/USPS-T1-25(b) in which you indicate the “RDC planning concept document” is “a network transition and implementation document” rather than one in which a decision is made about whether a facility should become an RDC.

- a. What document(s) will be used to determine whether a facility should become an RDC?
- b. Please provide the document(s) if they have not already been provided in this proceeding. .

OCA/USPS-34. Please refer to APWU/USPS-T1-24(c). Will newly leased facilities be renovated to a standardized footprint?