

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

EVOLUTIONARY NETWORK DEVELOPMENT
SERVICE CHANGES, 2006

Docket No. N2006-1

RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS SHAH
TO APWU INTERROGATORIES APWU/USPS-T1-31 AND 32

The United States Postal Service hereby submits the responses of witness Pranab Shah to the following interrogatories of the American Postal Workers Union, filed on May 31, 2006: APWU/USPS-T1-31 and 32.

Each interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS SHAH
TO INTERROGATORY OF THE AMERICAN POSTAL WORKERS UNION**

APWU/USPS-T1-31 Mr. Vogel has indicated in past presentations that there will be a reduction in the number of facilities doing processing and distribution work during the network alignment period and has, at times, provided an approximate number of facilities that will be closed.

- a) Are the END models designed to indicate which facilities should be closed?
- b) If the END model runs indicate that a particular facility would not be assigned mail, is that facility likely to be scheduled for closure?
- c) If the END model runs do not provide an indication as to which facilities should be closed, how is that determination made in the network planning process?

RESPONSE

a. The END models are designed to consolidate mail processing operations in order to maximize the equipment utilization. The model does not make decisions about closing facilities.

b and c. – A number of factors external to the model must be evaluated to determine the proper use for a facility in the future including, but not limited to:

- Future distribution and material handling technology deployments
- Local asset optimization (i.e., consolidation of leased carrier annexes)

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APWU/USPS-T1-32 Library Reference N2006-1/11 shows the AMPs for DuBois, Oil City and Bradford, PA. Since the destinating mail was consolidated for these facilities and they no longer appear on the list the USPS provided in DBP/USPS-14, they seem to be closed. Mr. Williams, in his response to APWU/USPS-T2-46, stated that "Oil City, PA; Bradford, PA; and Du Bois, PA Post Offices were not individually modeled; however, all function 1 workload was included." Please clarify Mr. Williams' answer to APWU/USPS-T2-46 and provide an explanation of how the END models were used with relation to these three facilities and/or the workload associated with them

RESPONSE

The workload for these offices was included as part of the workload for the gaining site in the END model, given that these AMPs were already approved.