

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

EVOLUTIONARY NETWORK DEVELOPMENT
SERVICE CHANGES, 2006

Docket No. N2006-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO VALPAK INTERROGATORY REDIRECTED FROM WITNESS SHAH
(VP/USPS-T1-16)
(June 26, 2006)

The United States Postal Service hereby submits an institutional response to the following interrogatory of Valpak, filed on June 9, 2006: VP/USPS-T1-16. The interrogatory has been redirected from Shah to the Postal Service for response. The interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF VALPAK
REDIRECTED FROM WITNESS SHAH**

VP/USPS-T1-16.

Please refer to your response to VP/USPS-T1-5(a).

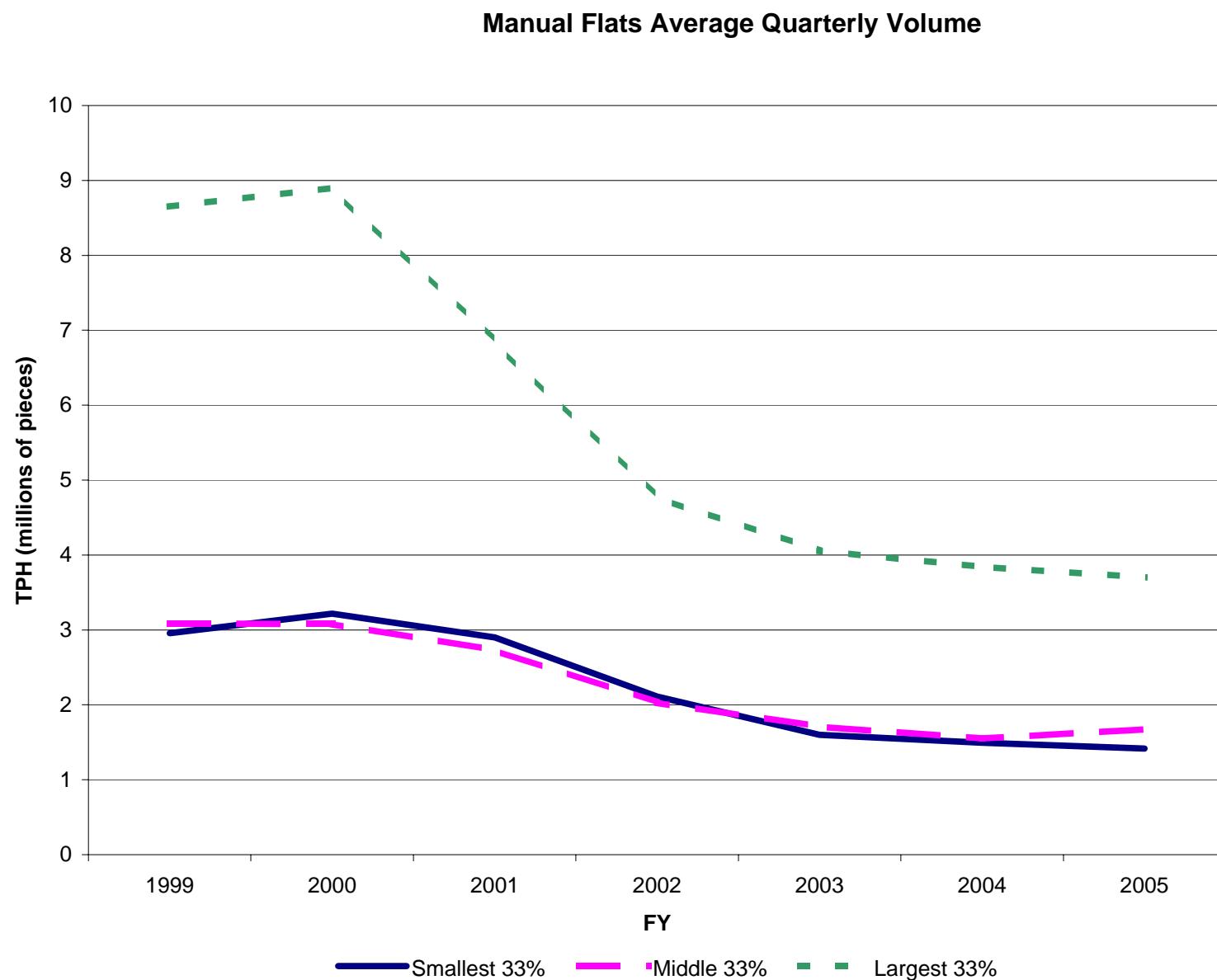
- a. Does the “existing product cost methodology used by Finance for production of the Cost & Revenue Analysis report” contain data which can be used to compare costs for facilities of different sizes. That is, could the data be used to ascertain how unit costs change as plant size increases? If so, please describe such data, and state whether you or the Postal Service has used the data for any such comparison.
- b. Does the Postal Service have data that show productivity trends for plants of different sizes? If so, please indicate what the productivity trends were for small, medium and large facilities “on the basis of a 7-year history at different facilities.”

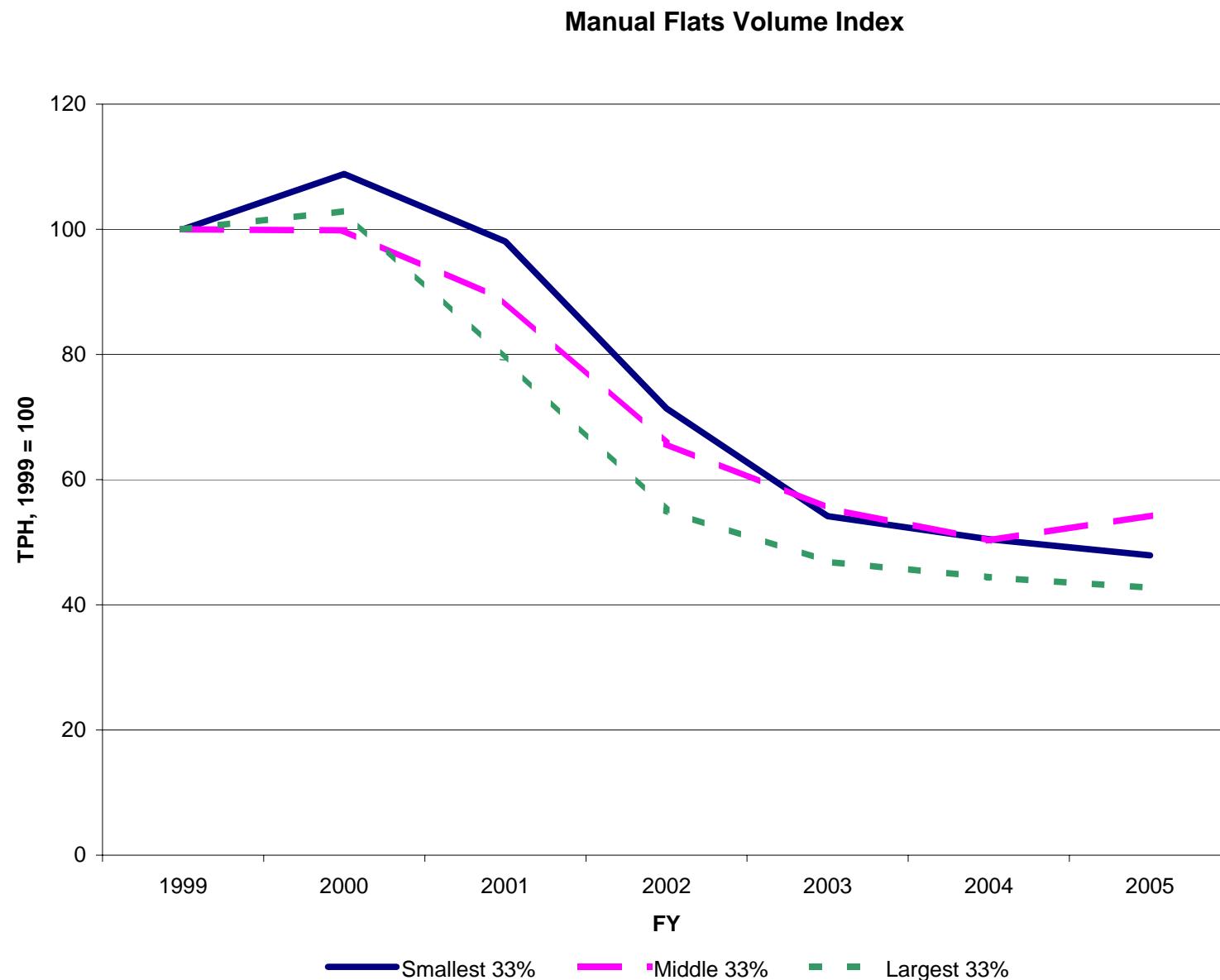
RESPONSE:

- a. Please see witness Bozzo's responses in Docket No. R2006-1 to VP/USPS-T12-5-7.
- b. Yes. The attached charts show the annual average productivities by facility size groups based on possible deliveries for FY1999-FY2005. The data are obtained from Docket No. R2006-1, USPS-LR-L-56.

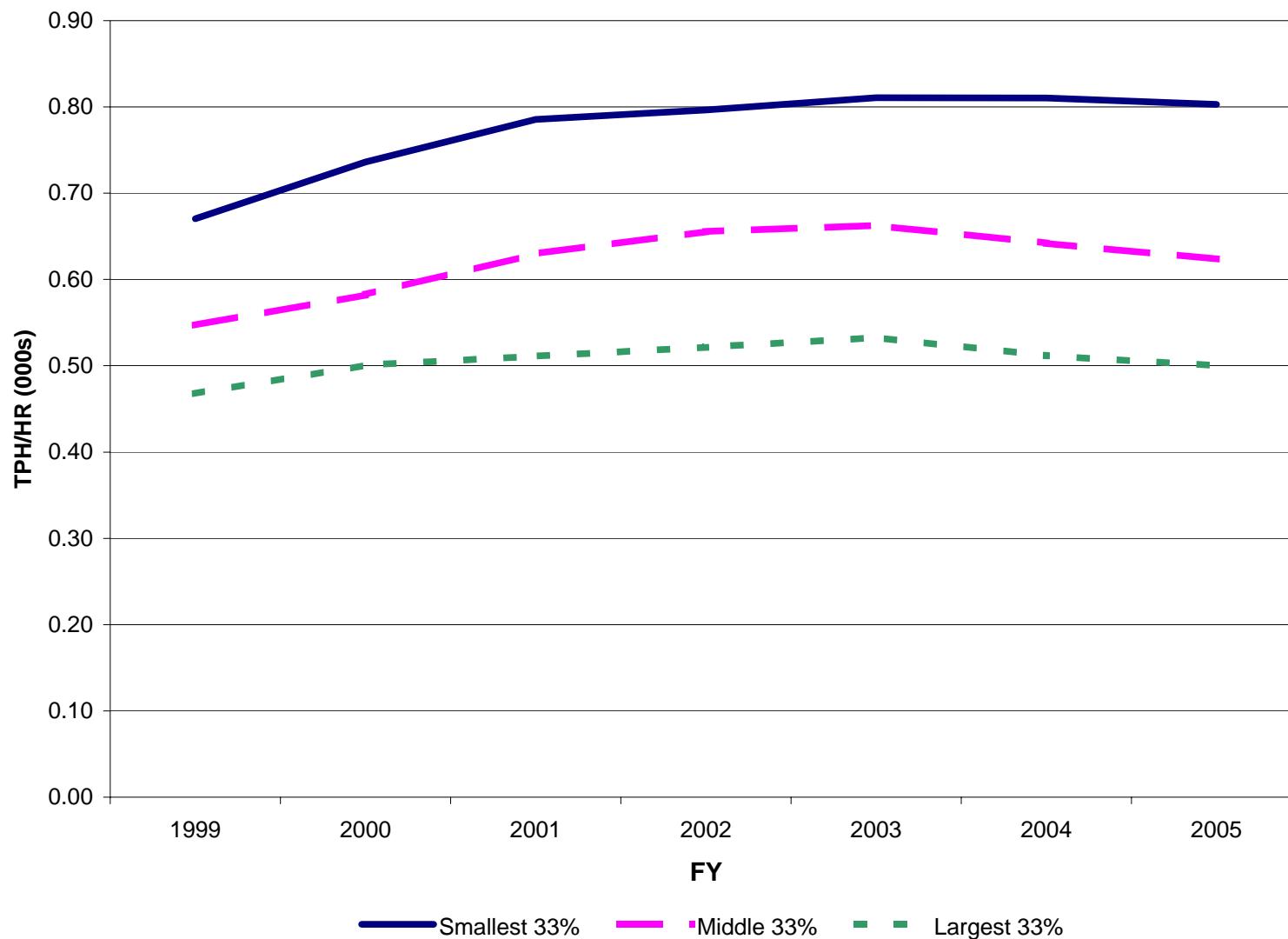
Manual Flats Average Productivity

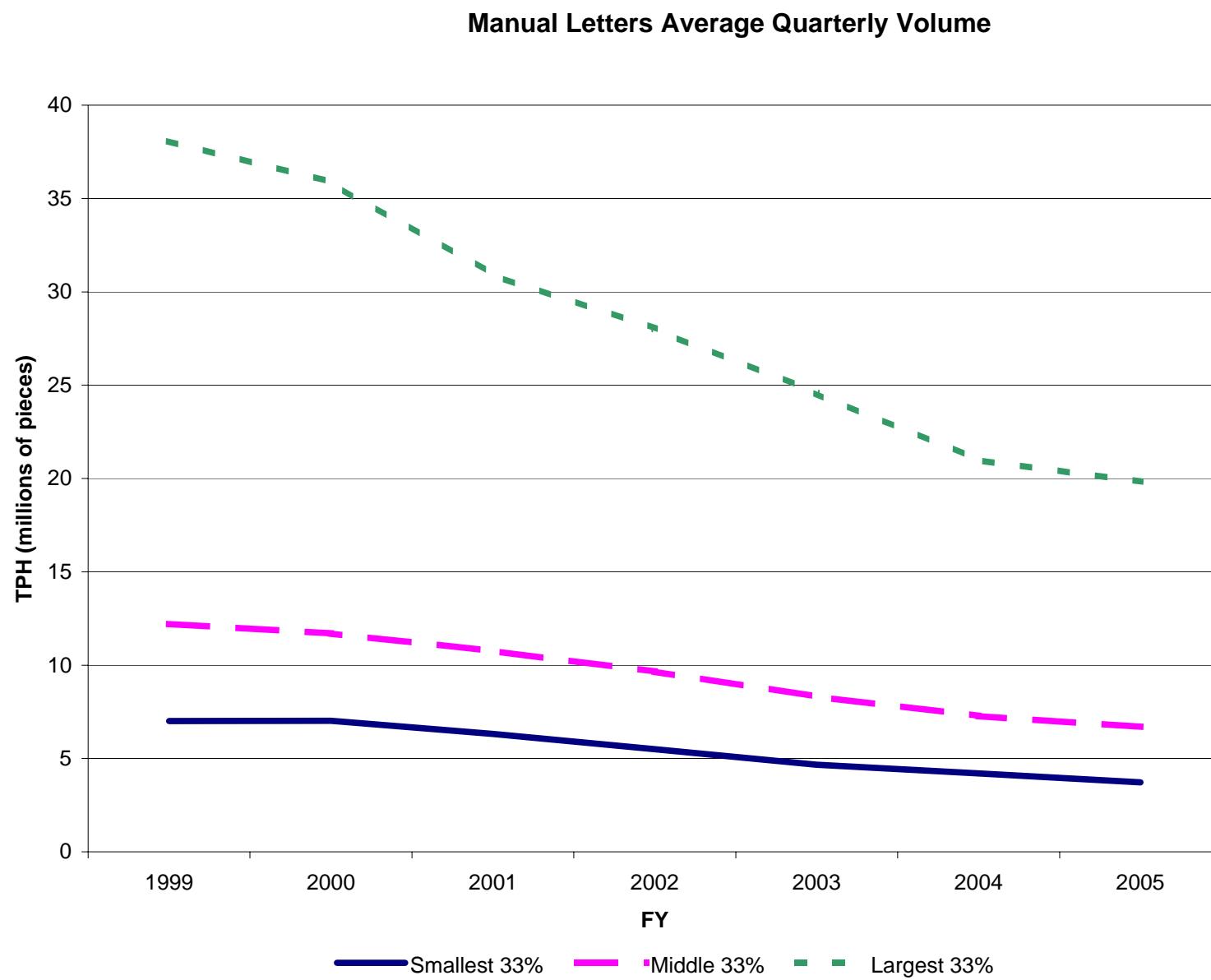


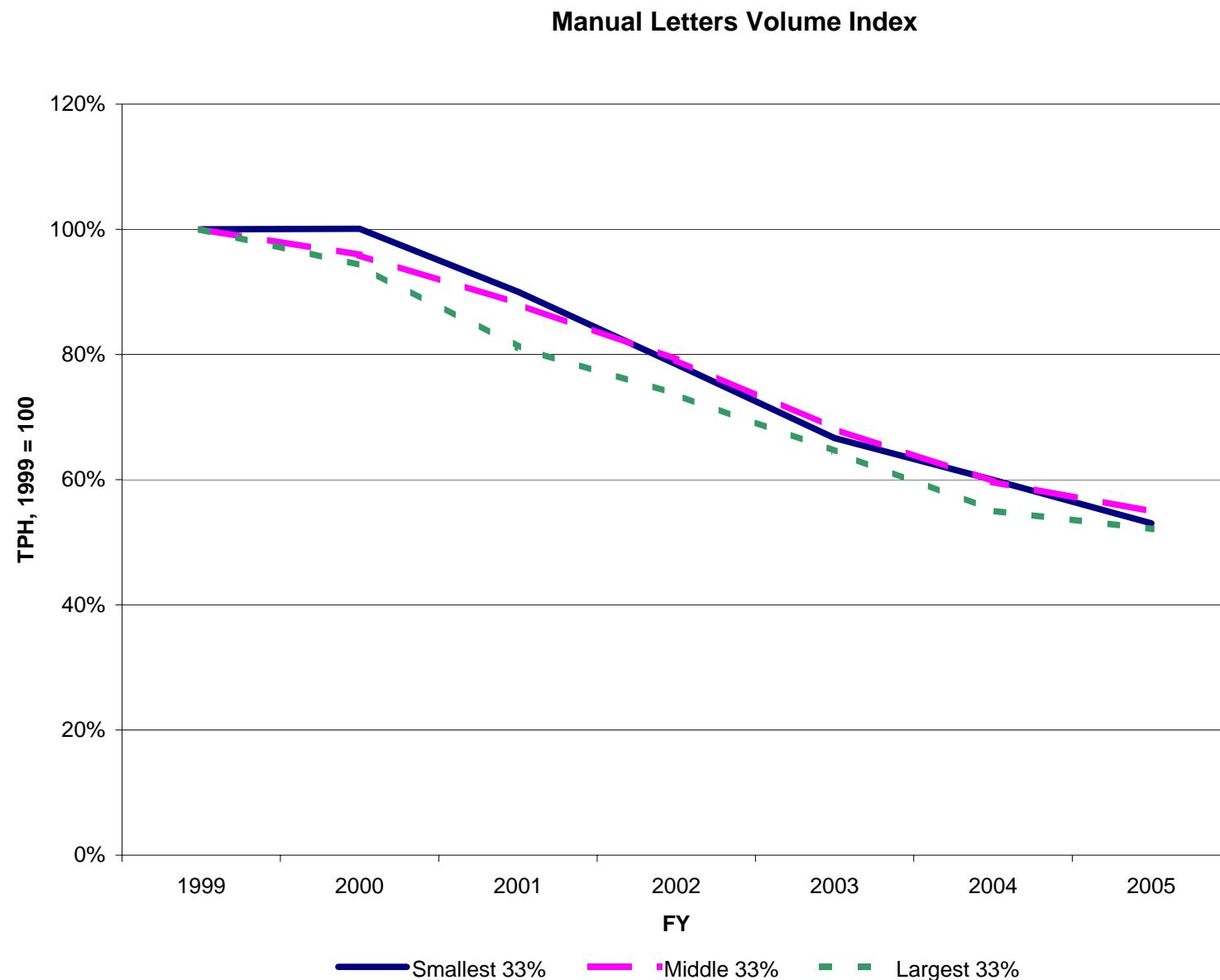


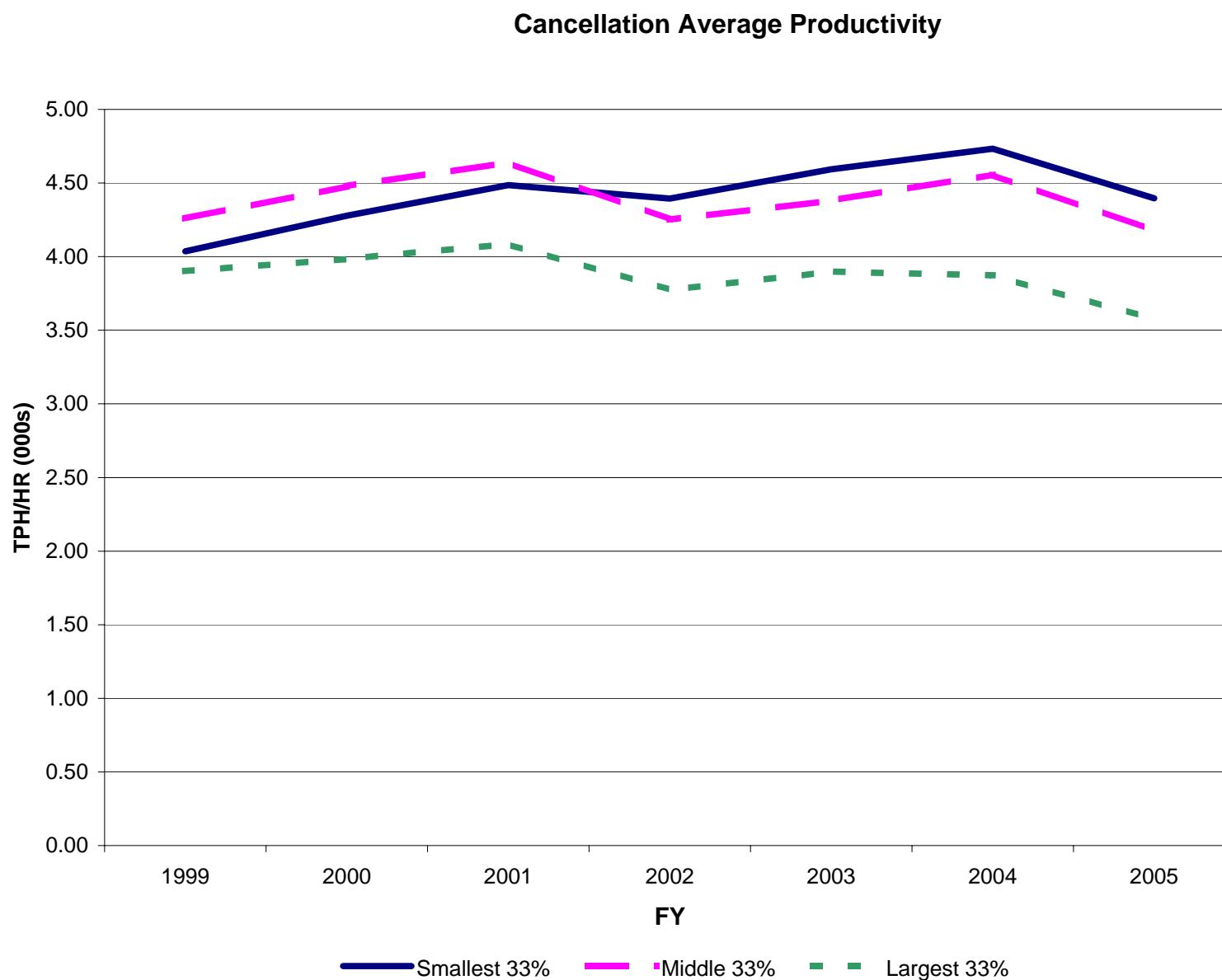


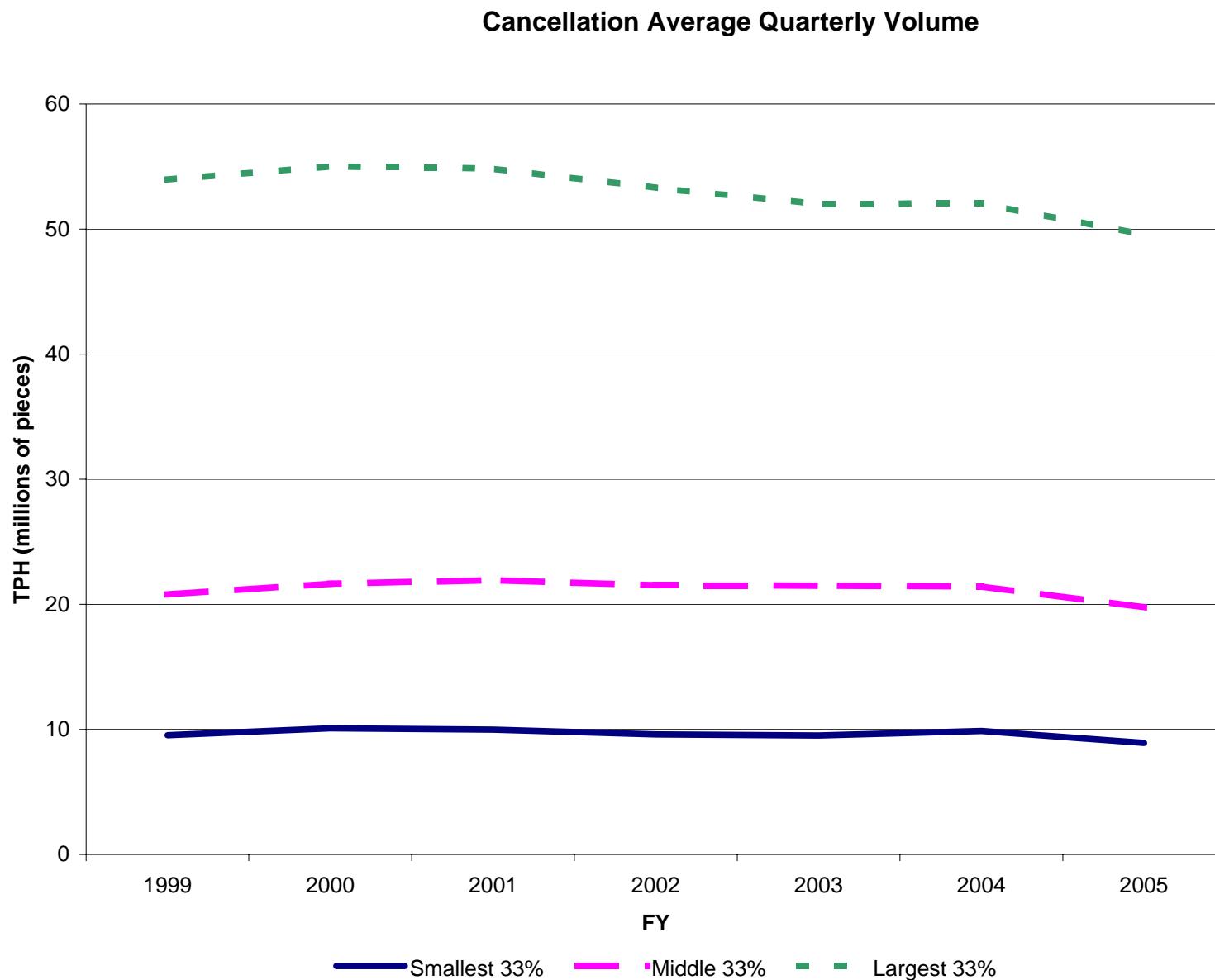
Manual Letters Average Productivity

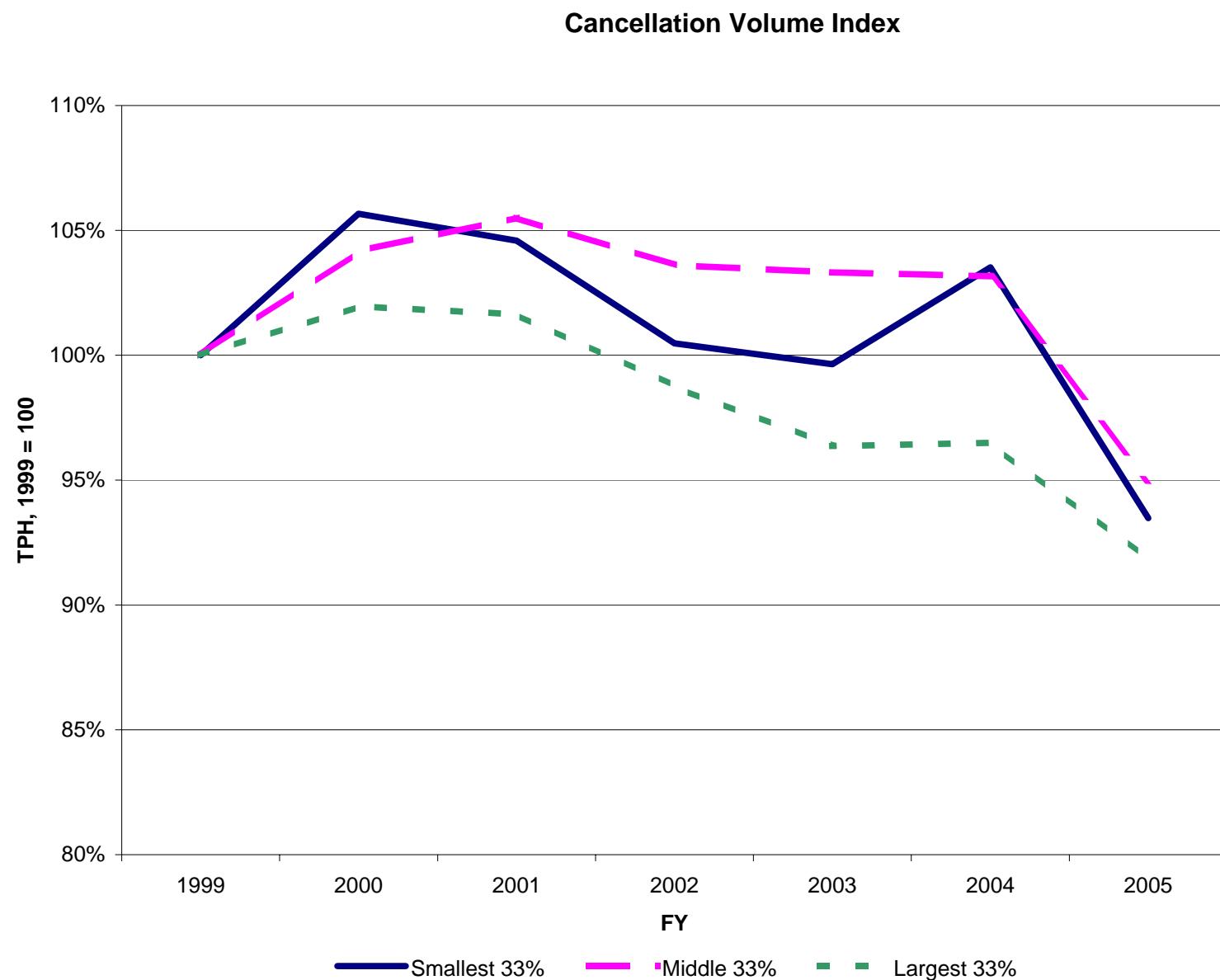




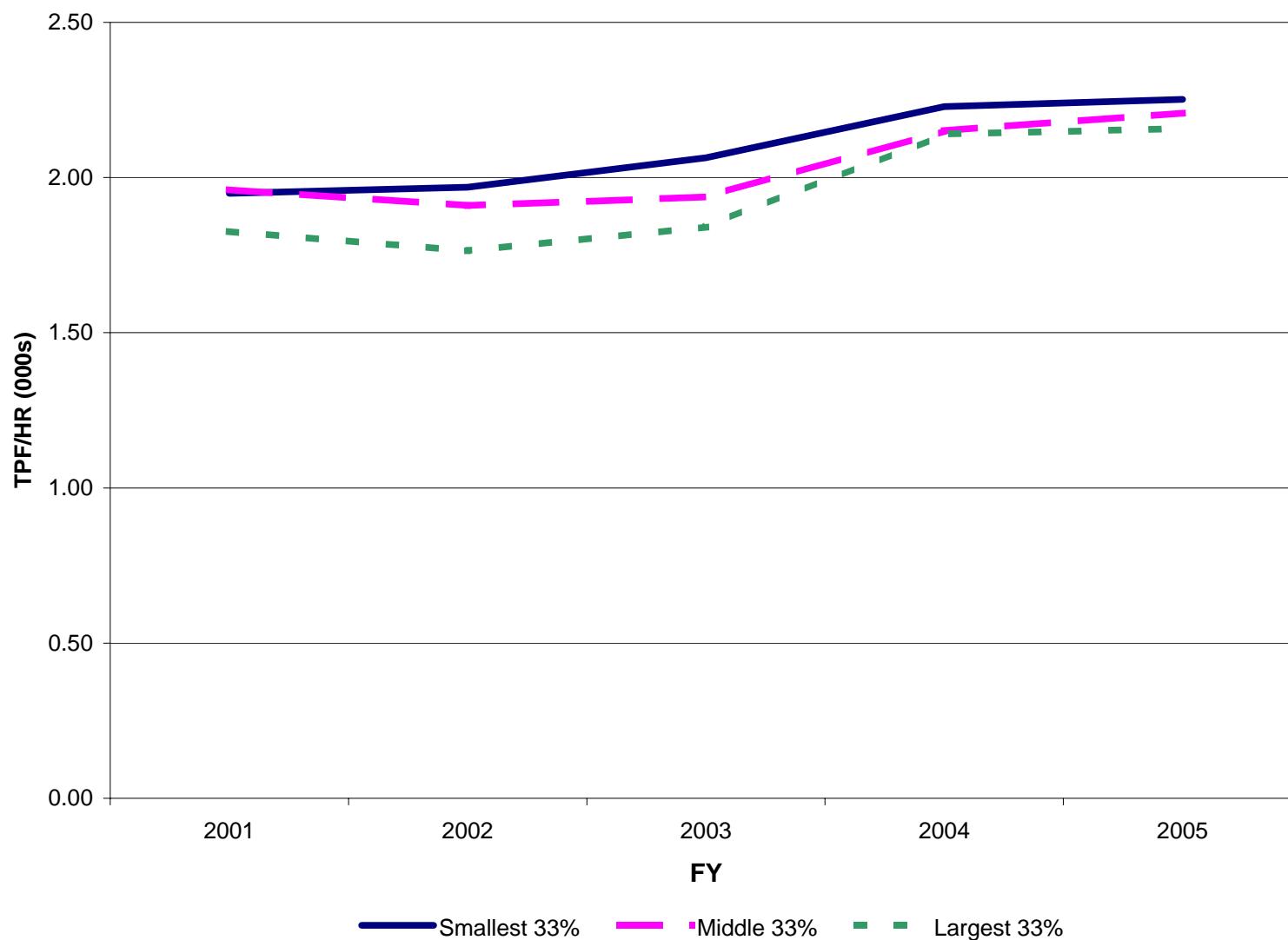




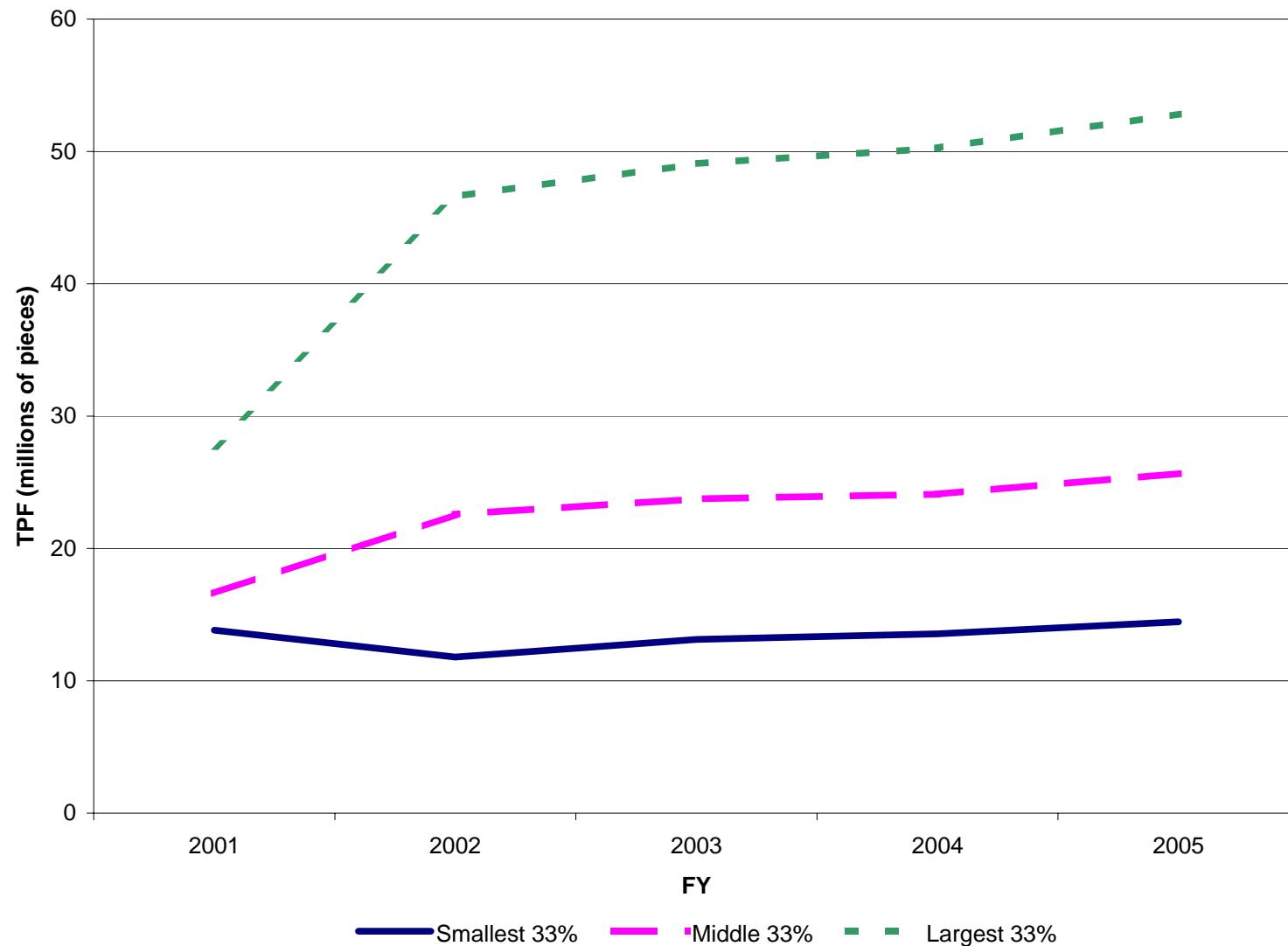




AFSM 100 Average Productivity

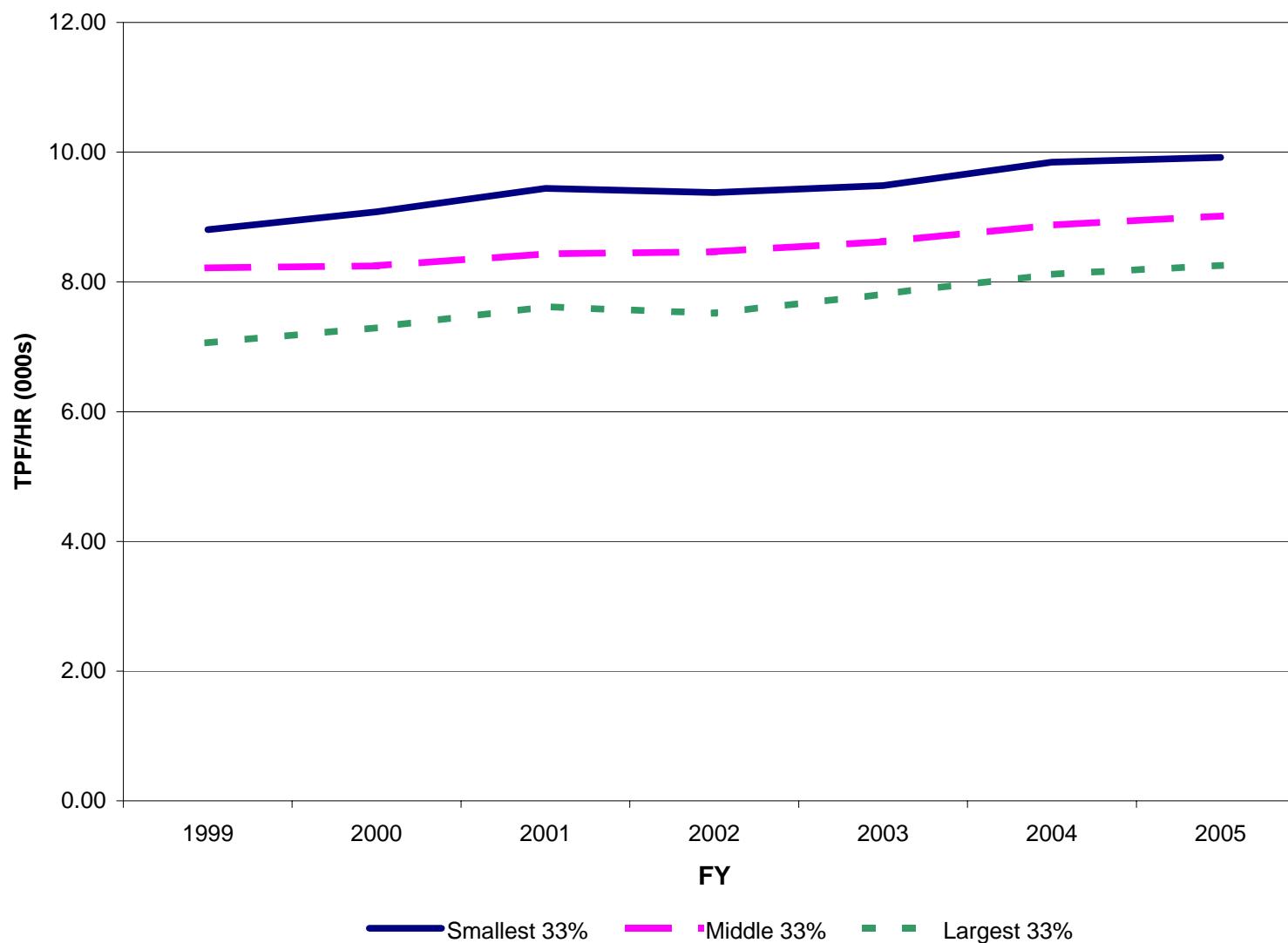


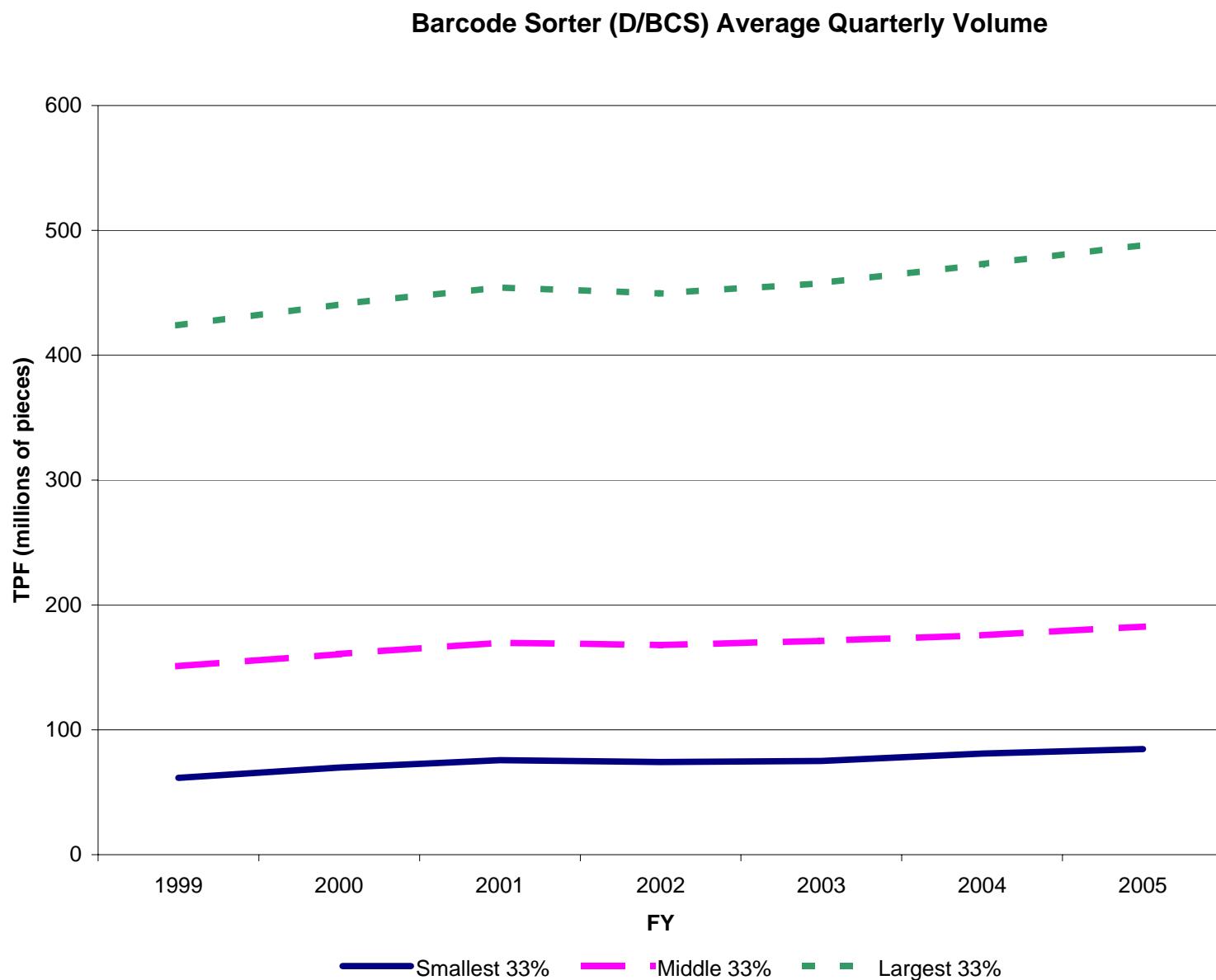
AFSM 100 Average Quarterly Volume

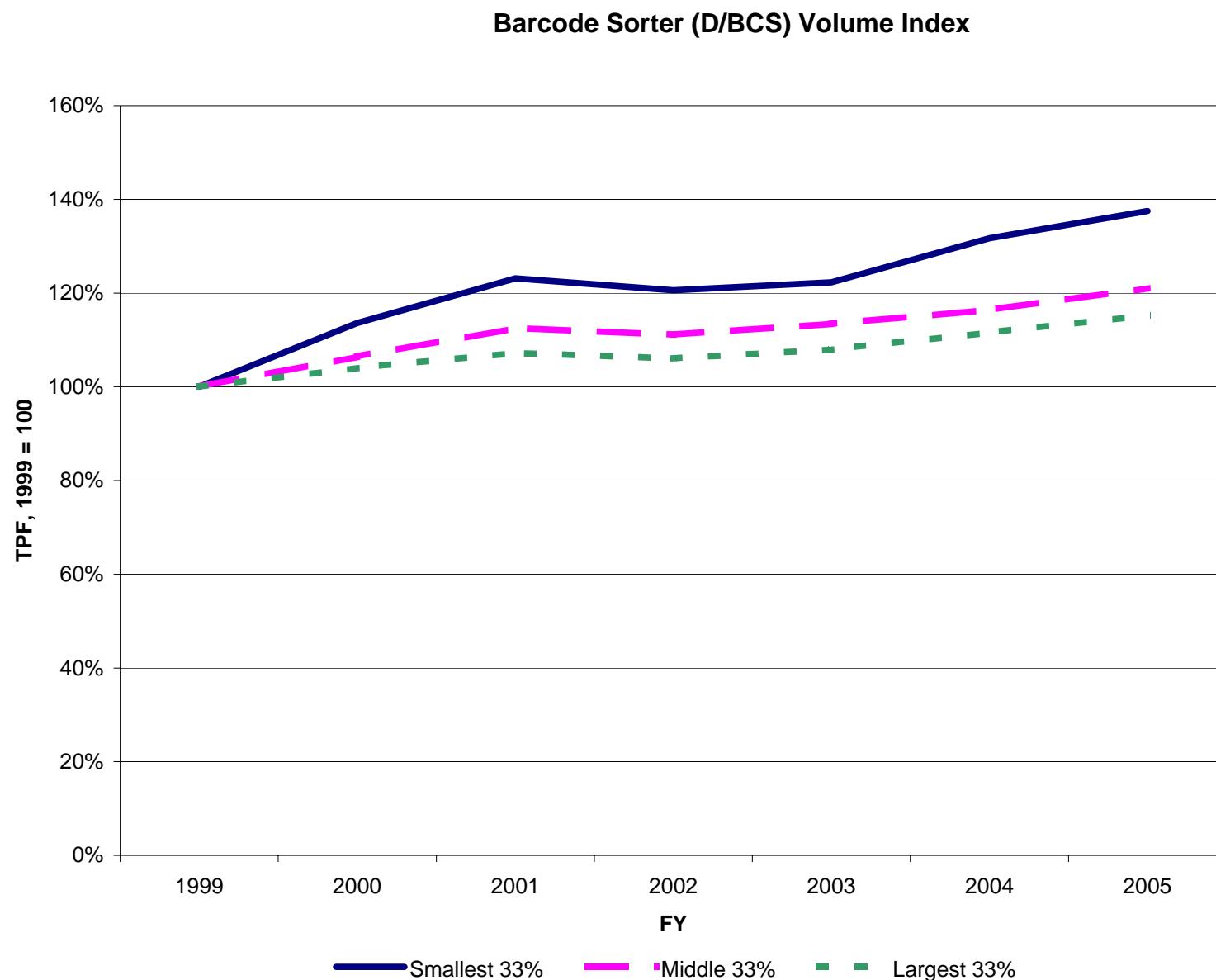


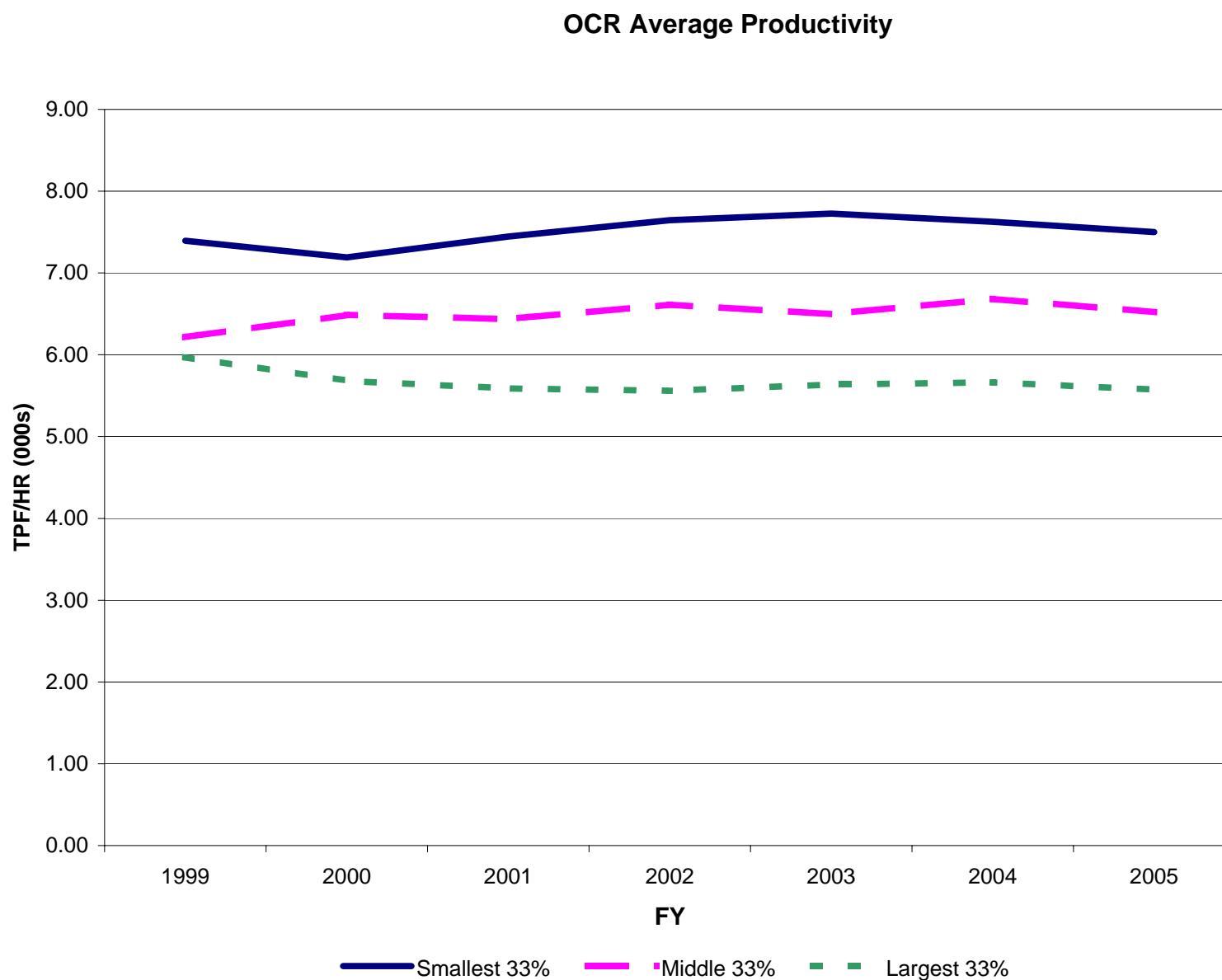


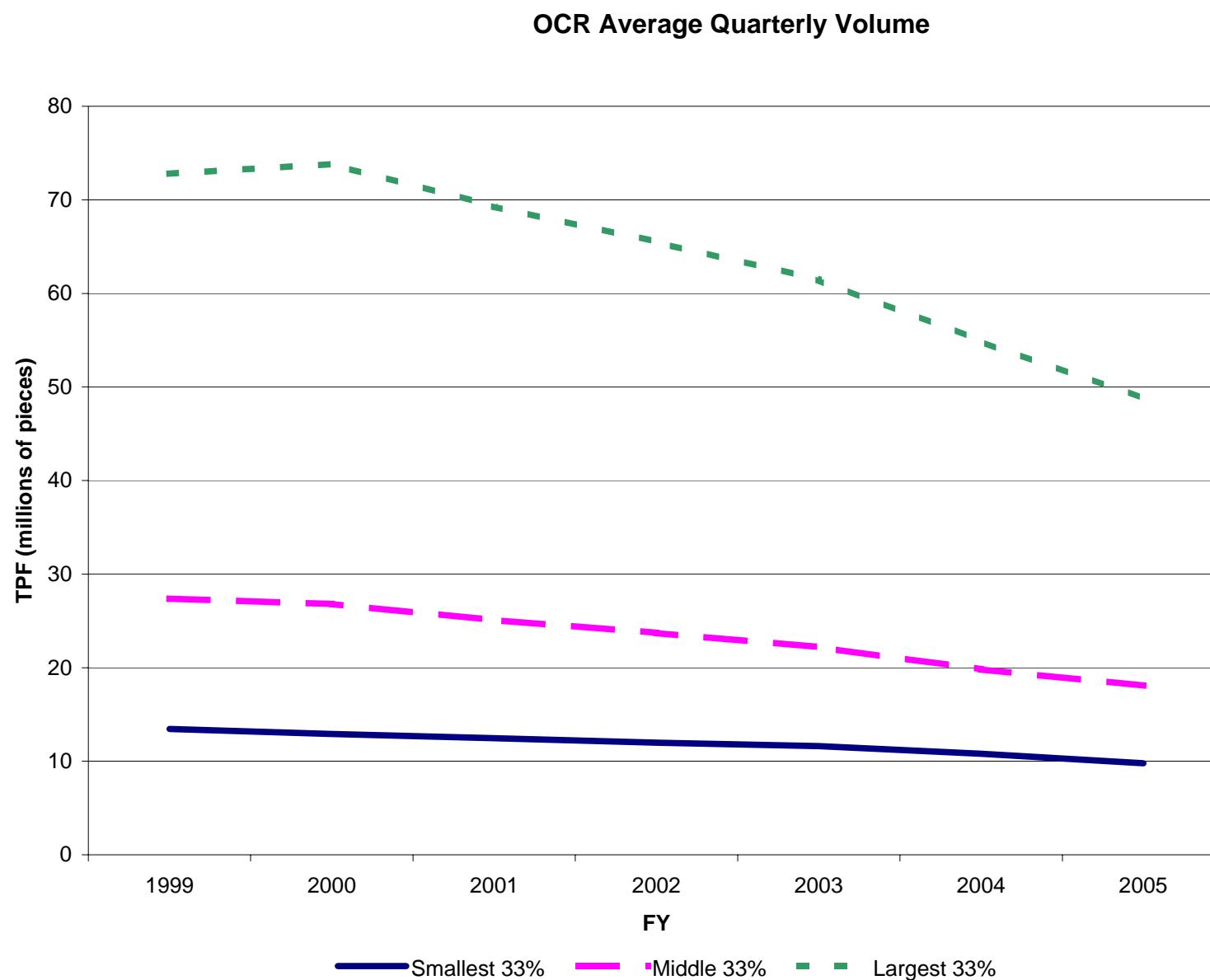
Barcode Sorter (D/BCS) Average Productivity

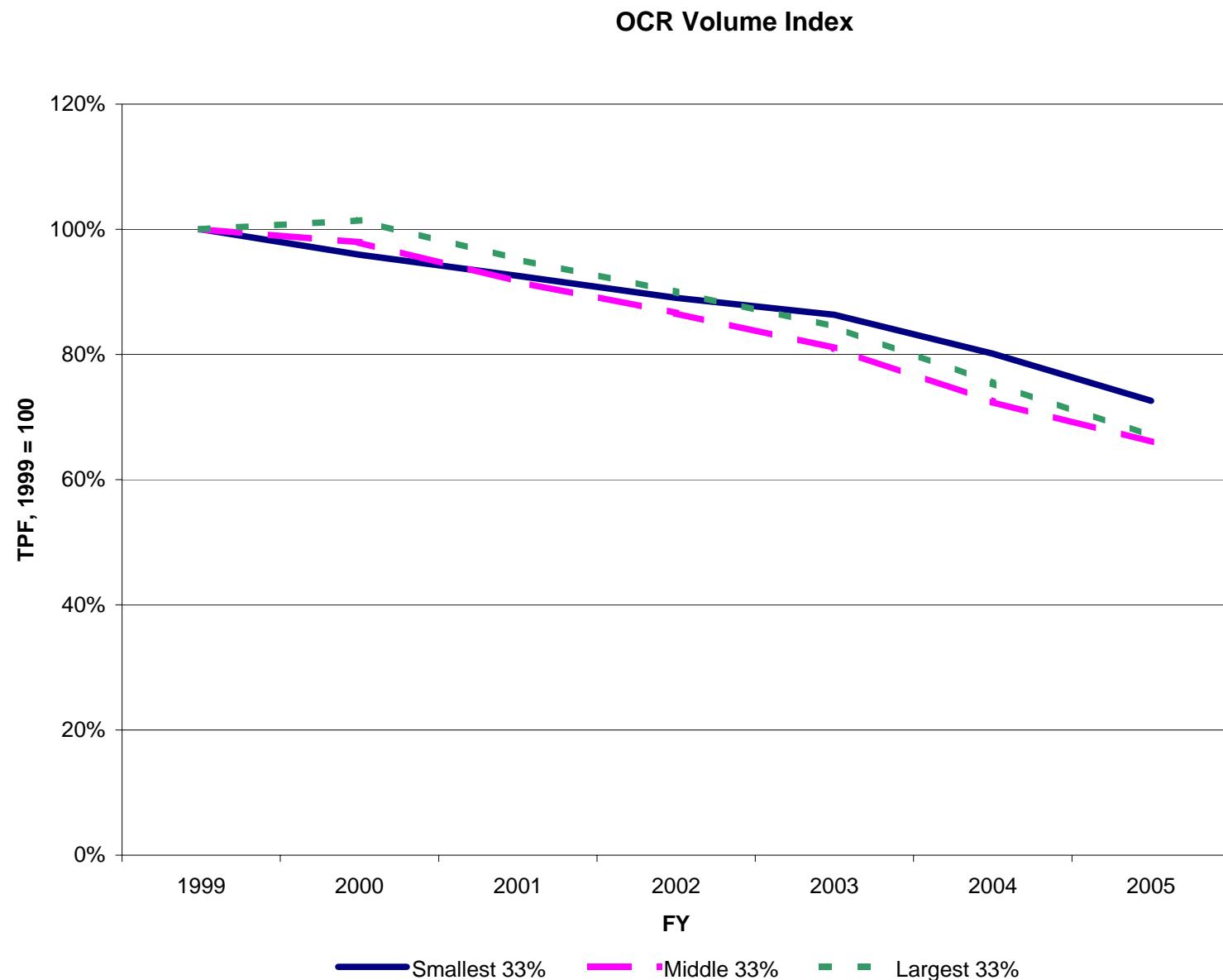












FSM 1000 Average Productivity

