

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

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**Rate and Service Changes To Implement  
Baseline Negotiated Service Agreement  
With Life Line Screening**

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**Docket No. MC2007-5**

**AMERICAN POSTAL WORKERS UNION, AFL-CIO, INTERROGATORIES TO  
UNITED STATES POSTAL SERVICE WITNESS MICHELLE K. YORGEY  
(APWU/USPS-T1-1-4)  
(September 21, 2007)**

Pursuant to Rules 25 through 28 of the Commission's Rules of Practice, the American Postal Workers Union, AFL-CIO (APWU) directs the following interrogatories to USPS witness Michelle K. Yorgey. If the witness is unable to respond to any interrogatory, APWU requests that a response be provided by an appropriate person capable of providing an answer.

Respectfully submitted,

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APWU/USPS-T1-1 Please confirm that the volume forecast shown on page 2 of Appendix A skips from FY2006 to FY2008 and does not show FY2007 volume.

APWU/USPS-T1-2 When will the Postal Service have actual FY2007 volume data for Life Line? Are there any partial year results available from the Postal Service's system to provide an estimate of actual FY2007 data for Life Line?

APWU/USPS-T1-3 On pages 8-9 of your testimony, you state that "the Postal Service believes that Life Line's presentations of its plans are reasonable and are relied on to support the agreement." Please provide a more complete analysis and explanation of why you believe that a decline in excess of 6% can be expected in Life Line's volume between FY2007 and FY2008 and a further decline of 4% can be expected in its volume between FY2008 and FY2009 if this agreement is not approved.

APWU/USPS-T1-4 If the Before Rates forecast of volume for 2008 through 2010 were equal to the 96,000,000 Mr. Greenberg is estimating for 2007, what impact would that have on your calculations?