

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

Retail Access Optimization Initiative

Docket No. N2011-1

**INTERROGATORIES OF THE
AMERICAN POSTAL WORKERS UNION, AFL-CIO
TO USPS WITNESS BOLDT
(APWU/USPS-T1-13-15)
(August 29, 2011)**

Pursuant to Rules 25 through 28 of the Rules of Practice, American Postal Workers Union, AFL-CIO directs the following interrogatories to United States Postal Service witness James J. Boldt (USPS-T-1). 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.

Instructions and Definitions applicable to these Interrogatories are contained in the Interrogatories of the American Postal Workers Union, AFL-CIO to the United States Postal Service witness Boldt (APWU/USPS-T1-1-5), filed on August 15, 2011, and are hereby incorporated by reference.

Respectfully submitted,

Darryl J. Anderson
Jennifer L. Wood
Counsel for American Postal Workers Union, AFL-CIO

APWU/USPS-T1-13 Please refer to your response to NAPUS/USPS-T1-12. You state that POS terminals are used to record non-financial postal transactions. However, you indicate only that “employees may use the ‘hot’ key on the POS terminal to record the occurrence of such transactions.” [Emphasis added.] Does the Postal Service not require non-revenue transactions to be recorded? If not, why not?

APWU/USPS-T1-14 In response to DBP/USPS-40, the Postal Service indicated that only approximately 18% of the facilities being considered for discontinuance utilize POS terminals. How are non-revenue transactions recorded and evaluated in facilities that do not utilize POS terminals?

APWU/USPS-T1-15 For each of the 18 non-revenue transactions listed below please specify: a) if the Postal Service records and evaluates the non-revenue transaction in the RAO process? b) If so, identify where these transactions are recorded and when in the process they are evaluated? c) If these non-revenue transactions are not considered as part of the RAO process, please explain why.

- 1) Non-automated mail pickup
- 2) Respond to CFS Issues
- 3) Summon Supervisor at Customer's Request
- 4) Change of Address Info Exempt from Fee
- 5) Product/Service Rate Inquires
- 6) Employment Application Inquiry
- 7) Voter Registration Inquiry
- 8) Give Local Directions
- 9) Provide Philatelic Info or Catalog
- 10) Accept Hold Mail Request Form
- 11) Request Passport Form
- 12) Request Tax Form
- 13) Accept Consumer Service Form
- 14) Request/Submit Selective Service Form
- 15) Supply PO Box Holder Name/Address
- 16) Supply Permit Holder Name/Address
- 17) Miscellaneous Forms
- 18) Other