

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

MAIL PROCESSING NETWORK RATIONALIZATION  
SERVICE CHANGES, 2011

Docket No. N2012-1

**RESPONSE OF UNITED STATES POSTAL SERVICE  
WITNESS WHITEMAN TO AMERICAN POSTAL WORKERS UNION, AFL-CIO,  
INTERROGATORY, REDIRECTED FROM WITNESS WILLIAMS  
APWU/USPS-T1-2(b)**

The United States Postal Service hereby provides the response of witness Whiteman to the above-listed interrogatory of the American Postal Workers Union, AFL-CIO, dated December 22, 2011. 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 UNITED STATES POSTAL SERVICE WITNESS  
WHITEMAN TO APWU INTERROGATORY,  
REDIRECTED FROM WITNESS WILLIAMS.

**APWU/USPS-T1-2.** Mr. Masse's testimony indicates that the Postal Service anticipates it could save, on net, \$2.1 billion per year from a full implementation of this plan. However, past experience indicates not all AMP studies will produce recommendations to consolidate.

\* \* \*

b) Do you expect the anticipated loss (2.9 billion pieces and \$0.5 billion in contribution) to be reduced if fewer facilities are consolidated?

**RESPONSE:**

The quantitative market research was not constructed to estimate the volume impact of closing any specific number of processing plants, or any specific processing plants. The research was constructed so that customers were read a "concept statement" describing the changes to First-Class Mail and Periodicals mail service standards, and then asked a series of questions by which they were able to indicate how their volume would be affected.