

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

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MAIL PROCESSING NETWORK RATIONALIZATION  
SERVICE CHANGES, 2012

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DOCKET No. N2012-1

**STATEMENT CONCERNING SCHEDULING  
SUBMITTED BY THE NATIONAL ASSOCIATION OF LETTER CARRIERS, AFL-CIO  
(January 6, 2012)**

The National Association of Letter Carriers, AFL-CIO ("NALC") submits the following statement concerning the scheduling of the above-referenced matter.

It is NALC's position that the period for discovery of the Postal Service's direct case should continue for no less than 45 days from the date of the Commission's issuance of its scheduling order. NALC also believes that no less than 45 days should be allowed for the preparation of rebuttal testimony after the Postal Service's direct case has entered into the record.

As it did in the Saturday delivery case, Docket N2010-1, NALC intends to present an expert economic witness who will, *inter alia*, expose the methodological flaws in the Postal Service's analysis. Because NALC just retained its expert earlier this week, and because the expert will need time to study the record and help NALC formulate discovery requests, NALC respectfully requests that the discovery period continue for no less than 45 days after the date that the Commission issues its scheduling order.

Due to the complexities of the case, and his other commitments, NALC's expert will also need at least 45 days to prepare rebuttal testimony following the entry of the Postal Service's case into the record.

NALC believes that its expert witness made a valuable contribution to the Commission's inquiry in the Saturday delivery case and would make no less of a contribution here. To do so, however, NALC must be permitted sufficient time to make its case.

NALC also supports the positions concerning scheduling articulated at the prehearing conference by its sister postal unions and by the Public Representative.

NALC recognizes the Postal Service's economic distress but strongly believes that the Commission should proceed deliberately here; the Commission may well conclude, after careful consideration of the evidence, that the Postal Service's proposal is misguided and will lead to far less in savings, and far more in forgone revenue, than the Postal Service is projecting. The importance of the Commission making the right decision counsels against making a hasty one.

NALC also respectfully requests that the Commission, in preparing its schedule, take into account that NALC's counsel will be unavailable on February 13-17; February 20; March 2; March 28-29; April 6; April 23-27; and May 15-17, 2012.

In addition, NALC requests that the Commission take into account, for purposes of scheduling rebuttal testimony dates, that NALC's expert will be unavailable on March 8-16, 2012 and on all Wednesdays through May 2012.

Respectfully submitted,

*Peter D. DeChiara*

Peter D. DeChiara  
Cohen, Weiss and Simon LLP  
330 West 42<sup>nd</sup> Street  
New York, NY 10036

Attorneys for the National Association  
of Letter Carriers, AFL-CIO