

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

**INTERROGATORIES OF THE AMERICAN POSTAL WORKERS UNION, AFL-CIO  
TO USPS WITNESS STEPHEN MASSE  
(APWU/USPS-T2-1)  
(January 17, 2012)**

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 Stephen Masse (USPS-T-2). 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 David E. Williams (APWU/USPS-T1-1-4), filed on December 22, 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-T2-1** On page 10 of your testimony you state “to ensure the Postal Service’s long-term survival, the expense line must urgently be reduced below the revenue line.” Given that the service changes presented in this docket were proposed in part because of their estimated cost savings, explain how the Postal Service’s proposed changes in service standards and network design complies with Section 101(a) of Title 39 which mandates that “[t]he costs of establishing and maintaining the Postal Service shall not be apportioned to impair the overall value of such service to the people” and describe the analysis that supports this explanation.