

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

Mail Processing Network Rationalization
Service Changes, 2012

Docket No. N2012-1

AMERICAN POSTAL WORKERS UNION, AFL-CIO,
MOTION FOR ACCESS TO
NON-PUBLIC INFORMATION IDENTIFIED
AS USPS-LR-N2012-1/NP2, NP4 and NP7
(January 19, 2012)

Pursuant to 39 CFR 3007.40 and Rule 21 of the Commission's Rules of Practice and Procedure, the American Postal Workers Union, AFL-CIO (APWU) hereby moves for access to certain Postal Service materials filed in the non-public annex of this docket.

APWU seeks access to the following non-public Library References:

- USPS-LR-N2012-1/NP2 FY2010 Workload Volume by Operation Type; and
- USPS-LR-N2012-1/NP4 Area Adjusted Results and Equipment Calculator Scoring Tool; and
- USPS-LR-N2012-1/NP7, Material Supporting Responses of Postal Service Witness Martin to Interrogatories of the Public Representative (PR/USPS-T6-7, 8 and 10).

Recently APWU engaged Decision/Analysis Partners (DAP) to act as a consultant on this case with an eye towards preparing rebuttal testimony. Specifically relevant to this potential rebuttal is the testimony of USPS witness Emily Rosenberg (USPS-T-3), her associated interrogatory responses, library references and other information related to her modeling efforts and outcomes, which includes the volume data contained in USPS-LR-N2012-1/NP7.

The Postal Service submitted Library References USPS-LR-N2012-1/NP2 and USPS-LR-N2012-1/NP4, both sponsored by witness Rosenberg, as part of its initial case filing with the Commission initiating this docket on December 5, 2011. APWU filed a Motion to Access this material on December 8, 2011 and was granted access on December 14, 2011, without objection from the Postal Service.

The Postal Service has scheduled a technical conference related to the testimony of witness Rosenberg for tomorrow, January 20, 2012. DAP representatives will attend this conference with other APWU representatives and consultants. In order to be prepared for the technical conference and to ensure useful participation, APWU requests that certain DAP representatives be granted immediate access to the Library References USPS-LR-N2012-1/NP2 and NP4. On Wednesday January 18, 2012, APWU counsel conferred with counsel for the Postal Service to see if the Postal Service would object to this request and was told that the Postal Service had no objection.

The Postal Service submitted Library Reference USPS-LR-N2012-1/NP7 on January 6, 2012. On January 13, 2012 APWU filed a Motion to Access this material. To date, the Postal Service has not objected to this Motion. For the reason stated in our January 13, 2012 Motion, APWU seeks access to this Library Reference for the DAP representatives identified below.

In accordance with 39 CFR 3007.40(b), the following APWU consultants have completed a Statement of Compliance with Protective Conditions Certification, found in Appendix A to Part 3007 of Title 39 of the Code of Federal Regulations, for Library References USPS-LR-N2012-1/NP2, NP4, and NP7:

Pierre Kacha
Decision/Analysis Partners
Consultant for American Postal Workers Union, AFL-CIO

Donald M. Baron
Decision/Analysis Partners
Consultant for American Postal Workers Union, AFL-CIO

Marc Schiller
Decision/Analysis Partners
Consultant for American Postal Workers Union, AFL-CIO

Kyle Stamper
Commonwealth Computer Research, Inc.
Systems Engineer
Decision/Analysis Partners

A copy of each Certification is attached hereto. The original Certifications will be promptly filed with the Commission. Persons identified by the Postal Service pursuant to Section 3007.2(c) have also been provided with a copy of this Motion and accompanying certifications today by email.

Conclusion

For the forgoing reasons, APWU respectfully requests that access to Library References USPS-LR-N2021-1/NP2, NP4, and NP7 be granted to the above named individuals as set forth in this Motion.

Respectfully submitted,

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