

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

MAIL PROCESSING NETWORK RATIONALIZATION
SERVICE CHANGES, 2011

Docket No. N2012-1

**RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS NERI TO
AMERICAN POSTAL WORKERS UNION, AFL-CIO INTERROGATORIES
(APWU/USPS-T4-11-13)
(January 24, 2012)**

The United States Postal Service provides the responses of witness Neri (USPS-T-4) to the above-listed interrogatories of the American Postal Workers Union, AFL-CIO, dated December 29, 2011. Each 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 NERI
TO AMERICAN POSTAL WORKERS UNION INTERROGATORY

APWU/USPS-T4-11 Please provide a description of the information and analysis that you used to determine the productivity percentages presented in Figure 12 on page 29.

RESPONSE:

Please see the response to Presiding Officer Information Request No. 1,

Question 7.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS NERI
TO AMERICAN POSTAL WORKERS UNION INTERROGATORY

APWU/USPS-T4-12 Please explain how redundant registry operations will produce a 50 percent improvement in productivity while redundant platform operations will only produce a 25 percent improvement in productivity.

RESPONSE:

Please see the response to Presiding Officer Information Request No. 1,

Question 7.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS NERI
TO AMERICAN POSTAL WORKERS UNION INTERROGATORY

APWU/USPS-T4-13 Manual operations only show a 3 percent productivity improvement. To what extent are manual operations driven by mail pieces that must meet their service standard but have missed their processing window?

RESPONSE:

The relationship between manual operations and mail piece processing windows was not analyzed as part of the assessment of the 3 percent productivity improvement. Please see the response to Presiding Officer's Information Request No. 1, Question 7 for a description of the productivity improvement estimates.