

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 NERI TO
AMERICAN POSTAL WORKERS UNION, AFL-CIO INTERROGATORY
(APWU/USPS-T4-8)
(January 30, 2012)**

The United States Postal Service provides the response of witness Neri (USPS-T-4) to the above-listed interrogatory of the American Postal Workers Union, AFL-CIO, dated December 29, 2011. The interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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January 30, 2012

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

APWU/USPS-T4-8 On page 18 of your testimony you state that this “environment would also impact flat-sized mail sortation as depicted in the table below.” Does this table indicate what proportion of mail would need to be finalized using a second pass? If not, please provide an explanation of this table.

RESPONSE:

Please see USPS Library Reference USPS-LR-N2012-1/38.