

Before the
POSTAL REGULATORY COMMISSION
Washington, DC 20268-0001

Mail Processing Network Rationalization)	Docket No. N2012-1
Service Changes, 2012)	

NATIONAL POSTAL MAIL HANDLERS UNION INTERROGATORIES TO USPS
WITNESS FRANK NERI (NPMHU/USPS-T4-18-20)

Pursuant to Rules 25 through 28 of the Commission’s Rules of Practice and Procedure, the National Postal Mail Handlers Union (“NPMHU”) hereby submits the following interrogatories to USPS witness Frank Neri, USPS-T4. If the witness is unable to respond to any interrogatory, please redirect the interrogatory to a more appropriate USPS witness.

Instructions and Definitions

“USPS” or “Postal Service” means the United States Postal Service, its employees, agents, witnesses, and all other persons who act under the direction of the United States Postal Service, including but not limited to consultants and other independent contractors.

“Mail Processing Network Rationalization Service Changes, 2012” (MPNR) or means the proposed restructuring of the USPS’s mail distribution and transportation

network presented to the PRC in its December 5, 2010 “Request of the United States Postal Service for an Advisory Opinion on Changes in the Nature of Postal Services.”

“MNPR Network” means the mail distribution and transportation network required to implement the USPS’ MNPR and that, inter alia, accommodates the USPS’s elimination of 252 mail processing facilities.

“Documents” has the meaning as ascribed within the federal Rules of Civil Procedure and includes any documents or things that constitute or contain matters that are relevant to the subject matter of this proceeding and that are in the custody or control of the USPS.

“Losing facility” is defined and used herein in the same manner as it is defined and used in Section 1-1.2 of the PO-408 handbook.

“Gaining facility” is defined and used herein in the same manner as it is defined and used in Section 1-1.2 of the PO-408 handbook. The term document has the same meaning as ascribed within the federal Rules of Civil Procedure.

The term “person” means any natural person, corporation, partnership, proprietorship, association, organization or group of natural individuals.

The term “identify,” when used with regard to a person means to provide the full name, position, address and telephone number of the person.

The term “identify,” when used with regard to a document means to describe the subject matter of the document, its author, its date and any addressee.

Interrogatories

NPMHU/USPS-T4-18 Referring to Library Reference 44 associated with your testimony:

- (a) In response to NPMHU/USPS-T4-12, you state that “the 27% [idle time reduction] figure refers to the total amount of idle time in the mail processing network as seen in USPS Library Reference USPS-LR-N2012-1/44.” Please provide the Excel sheet name, column number and row letter in which this 27% figure can be found within Library Reference 44.
- (b) In the “Data” sheet of the Excel file contained in Library Reference 44, please explain why the % Idle time is calculated as Idle Time divided by Operating Time, whereas the % Utilization is calculated as the Operating Time divided by the Window time, and % Processing is calculated as (Run Time plus Down Time) divided by the Window time.
- (c) Please confirm that calculating Idle Time by using Operating Time as the denominator rather than Window time results in large % Idle time calculations. If not confirmed, please explain why this is incorrect.
- (d) Please confirm that Percent Utilized on the “Summary Sheet” is equivalent to “Pct Oper” on the “Data” sheet. If not confirmed, please explain the difference between these terms.
- (e) Referring to the “Summary Sheet,” please explain why the included formulas run to row 3027, but the rows on the “Data” sheet only run to 3000.

- (f) Please explain why there are significant variations in the number of machines from week to week, for instance and solely as one example, why there would be 5 AFCS200 machines on Saturday, 11/20/10; 3 on Saturday 11/27/10; and 6 on Saturday, 12/4/10.
- (g) Please confirm that, by averaging productivity numbers over a year's time from October 2010 to October 2011, the "Summary Sheet" data includes inefficiencies that may have been reduced during this time period, and therefore may overstate the remaining inefficiency. If not confirmed, please explain.
- (h) Please confirm that, for instance, the FSS machine averaged 55% utilization and 19% idle time during the first week of October 2010, but 82% utilization and 16% idle time during the last week of September 2011. If not confirmed, please explain why this is incorrect.

NPMHU/USPS-T4-19 Referring to Library Reference 48:

- (a) please explain what "operation", "fhp", "tph", "nonaddtp", "tpf", and "hours" mean.
- (b) Please explain how the data in this spreadsheet can be used to calculate productivity variances across or between mail processing plants, as you stated in your response to NPMHU/USPS-T4-17(b).

NPMHU/USPS-T4-20 Please confirm that your decision to utilize a 15 percent overall productivity increase, as stated in your response to POIR Request No. 1, Question 7(a), was based solely on your professional judgment and that there are no workpapers associated with your decision to use this figure. If not confirmed, please explain why this is incorrect and provide any workpapers.

Respectfully submitted,

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As agent for and authorized by:

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