

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

**MAIL PROCESSING NETWORK
RATIONALIZATION SERVICE CHANGES, 2012**

Docket No. N2012-1

**INTERROGATORIES OF THE AMERICAN POSTAL WORKERS UNION, AFL-CIO
TO USPS WITNESS CHERYL D. MARTIN
(APWU/USPS-T6-3-6)
(February 23, 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 Cheryl D. Martin (USPS-T-6). 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-T6-3 What are the operating rules on the co-loading of different classes of mail on transportation among the network plants?

- a) Can and do sub-categories of parcel mail get co-loaded at any given time in the network?
- b) Specifically, are other sub-categories of parcels co-loaded in the current operations with FCM parcels?
- c) What operating rules exist, if any, for co-loading competitive parcel products with market dominant classes of mail, and specifically the parcel sub-categories of market dominant mail classes?
- d) What percentages of each sub-category of parcels are co-loaded in the current operations?
- e) Specifically, what percentage of Priority mail parcels is co-loaded with other classes of mail or parcels in the current operations?

APWU/USPS-T6-4 For those market-dominant classes of mail and specifically the sub-categories of parcels for which the testimony says there will be no changes in service standards, will there be changes to CET times for induction of the mail into the network?

APWU/USPS-T6-5 What is the impact of longer transit times/farther distances among plants on the CET times for mail and parcel induction by each class and sub-category of mail and parcels?

APWU/USPS-T6-6 What are the overall expected changes in transit times given the longer distances between plants?