

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

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

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**Docket No. N2012-1**

**INTERROGATORIES OF THE AMERICAN POSTAL WORKERS UNION, AFL-CIO  
TO USPS WITNESS EMILY ROSENBERG  
(APWU/USPS-T3-26-27)  
(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 Rosenberg (USPS-T-3). 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-T3-26. Please refer to USPS Library Reference N2012-1/13, tab 'CANC', columns J and L.

- a) Please confirm that column J reports ODIS volumes, and column L reports MODS cancellation piece handling volumes. If you do not confirm, please explain what volumes column J and L do report, and how these volumes are derived.
- b) Please explain why the ratios of the column L volumes over the column J volumes vary from facility to facility. For example, the ratio of column L over column J volumes for Springfield MA P&DC is 2.50, whereas the corresponding ratios for Boston P&DC and Brockton P&DC are 3.20 and 2.35, respectively.

APWU/USPS-T3-27 Please refer to USPS Library Reference N2012-1/13, tab 'CANC', columns D, E and N.

- a) Please confirm that any facility listed in column D but not in column E is a non-MODS facility that does cancellation of at least some of the mail originating from the 3-Digit ZIP Code it is responsible for. For example, row 57 reports Martinsburg, WV as a non-MODS facility that cancels at least some of the mail originating from ZIP 254. If you do not confirm, please explain what it means for a facility to be listed in column D but not in column E.
- b) For each facility listed in column D but not in column E, please confirm that the column N "FY10 MODS" volume is an estimate of the cancellation piece handlings this facility would have reported to the MODS database if it had been a MODS facility in FY 2010. If you do not confirm, please explain how to interpret the column N volumes reported for all facilities which are listed in column D but not column E.