

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

Mail Processing Network Rationalization
Service Changes, 2012

Docket No. N2012-1

AMERICAN POSTAL WORKERS UNION, AFL-CIO,
MOTION FOR ADDITIONAL ACCESS TO
NON-PUBLIC INFORMATION IDENTIFIED
AS USPS-LR-N2012-1/NP1, NP6, NP7, NP8 and NP12
(February 24, 2012)

On February 14, 2012, American Postal Workers Union, AFL-CIO (APWU), filed a Motion for Access to Non-Public Information Identified as USPS-LR-N2012-1/NP1, NP6, NP7, NP8 and NP12. Accompanying this Motion was the signed certifications of several APWU consultants from Shorter Cycles, LLC. One member of the Shorter Cycles team was out of the country during this filing and was unable to complete the necessary Statement of Compliance with Protective Conditions Certifications pursuant to 30 CFR 3007.40(b). Relevant certifications have now been completed for the following individual:

Jim Lynch
Shorter Cycles
Senior Consultant
APWU Consultant

A copy of the Certifications are attached hereto.

For the reasons stated in our February 14, 2012 Motion for Access, hereby incorporated by reference, APWU respectfully requests that the above named individual be granted access to the non-public Library References USPS-LR-N2021-1/NP1, NP6, NP7, NP8, and NP12. Furthermore, APWU's February 14, 2012 Motion was granted on February 21, 2012, without objection from the Postal Service. Time is of the essence in

this case and since the Commission has already granted to access to the remainder of the Shorter Cycles team, APWU respectfully requests that Mr. Lynch be granted immediate access to the above referenced non-public library references.

Persons identified by the Postal Service pursuant to Section 3007.2(c) have been provided with a copy of this Motion and accompanying certification today by email.

Conclusion

For the forgoing reasons, APWU respectfully requests that access to Library References USPS-LR-N2021-1/NP1, NP6, NP7, NP8, and NP12 be immediately granted to the above named individual as set forth in this Motion.

Respectfully submitted,

Jennifer L. Wood
Counsel for American Postal Workers Union, AFL-CIO