

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, DC 20268-0001

Mail Processing Network  
Rationalization Service Changes, 2012

Docket No. N2012-1

PUBLIC REPRESENTATIVE'S THIRD SET  
OF INTERROGATORIES AND REQUESTS FOR PRODUCTION TO  
UNITED STATES POSTAL SERVICE WITNESS BRADLEY (PR/USPS-T-10: 10-11)

(February 24, 2012)

Pursuant to 39 CFR 3001.25 through 3001.28, the Public Representative hereby submits the following interrogatories and requests for production of documents. Definitions and instructions included with the Public Representative's First Set of Interrogatories and Requests for Production to United States Postal Service, PR/USPS-1-3 dated December 21, 2011, are hereby incorporated by reference.

The Public Representative encourages the Postal Service to discuss issues of burden, privilege, relevance, or question clarity informally to obviate the need for objections or motions practice.

Respectfully Submitted,

/s/ Christopher J. Laver

Public Representative for  
Docket No. N2012-1

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**PR/USPS-T-10-10**

Please refer to USPS-LR-N2012-1/20, File: "FY2010 MODS HOURS.xls," USPS-LR- N2012-1/48, File: "modstour2010-public.csv," USPS-T-4, Direct Testimony of Frank Neri (page 29), and the table below.

OPERATION NAME	MODS NUMBER
OCR	46,961,962,963,964,965,966,967
BCS/DBCS	47,80,87,88,91,92,93,94,95,96,97,98,99,205,261,262,263,264,265,266,267,271,272,273,274,275,276,277,281,282,283,284,285,286,287,291,292,293,294,295,296,297,309,313,314,317,318,319,357,381,382,383,384,385,481, 482, 483, 484, 485, 488, 489, 491, 492, 493, 494, 495, 496, 497, 501, 502, 503, 504, 505, 506, 507, 891, 892, 893,894,895, 896,897,898,899, 908,909,919
AFSM100 (incl. LDC17 op #s 140 and #530)	140,141,142,143,144,145,146,147,194,195,331,332,333,334,335,336,337,401,402,403,404,405,406,407,461,462,463,464,465,466,467,469,530,531,532,533,534,535,536,537,538
FSM 1000	305,306,307,308,441,442,443,444,445,446,447,448,449,450,451,811,812,813,814,815,816,817,818,819
Mechanized Parcels	101,105,107,851,938,939,940,941
SPBS - Non Priority	56,134,135,136,137,153,154,155,156,157,216,218,219,220,221,242,243,244,245,246,247,254,255,256,257,346,347,435
SPBS - Priority	138,139,152,159,191,222,223,248,249,258,259,438,439,942,943
Mechanical Sort - Sack Outside	238,239,349,428,429,432,433
Mechanical Tray Sorter / Robotics	198,199,430,431,618,619,627,628,629
Manual Flats	60,61,62,63,70,71,72,73,170,175,178,179
Manual Letters	30,31,32,33,40,41,42,43,44,90,150,160,168,169
Manual Parcels	100,102,103,130,200,203
Manual Priority	50,51,52,53,54,55,320,321,322,323,324,325,326,618
Cancellation	4,6,7,9,10,11,12,13,14,15,16,17,18,19,66,67,89,468
Dispatch	124,125,126,127,128,129
Flats Preparation (excl. LDC17 op#s 140 & #530)	35
Mail Preparation - metered	20,21,22
Opening Unit - BBM	115,116,117,185,186
Opening Unit - Preferred Mail	84,110,111,112,180,181,328,329,343,344
Opening - Manual transport	114
Platform	188,210,211,212,213,214,215,225,229,230,231,351,352,454
Pouching Operations	120,121,122,123,345
Presort	2,3
Manual Sort - Sack Outside	235,348
Air Contract DCS and Incoming/SWYB	64,118,189,208,209,350
Business Reply / Postage Due	578,585,568,587,588,589,590
Registry	578,585,590
Damaged Parcel Rewrap	109,574
Empty Equipment	549,576
Miscellaneous	83,132,545,546,560,561,562,563,564,577,580,681
Mail Processing Support	340,341,547,548,554,555,565,567,607,612,620,630,677,755,798

The left column in the table below lists the 31 operations on page 29 of Mr. Neri's testimony.

- i. Please confirm the MODS Numbers corresponding to each operation in the table below fully comprise or exhaust the MODS numbers associated with finance numbers whose status was either "Y" or "N" in "FY2010 MODS HOURS.xls, and which correspond to Mr. Neri's operations.
- ii. If you do not confirm, please modify the table above so that each operation is properly paired with the MODS Numbers that comprise the operations listed in the left-hand column of the table above for finance numbers whose status was either "Y" or "N" in "FY2010 MODS HOURS.xls."

### **PR/USPS-T-10-11**

Please refer to the most recent MODS manual, Section "MODS Operation Numbers," and Responses of the United States Postal Service to Questions 1-22, 24-26 of Chairman's Information Request No. 4, ChIR.4.Q.15.c.MODS.xlsx.

- a. Please confirm that the following MODS Operation Numbers presented in "FY2010 MODS HOURS.xls," for finance numbers whose status was either "Y" or "N" do not have TPH, FHP, or N-TPH as volumes: 80, 188, 189, 328, 329, 340, 341, 352, 454, 531, 545, 546, 547, 548, 549, 554, 555, 560, 564, 565, 567, 573, 574, 575, 577, 578, 607, 612, 620, 630, 677, 681, 755.
- b. If you do not confirm, please identify the type of volume for each of the MODS Numbers in question 3, whether it is a type of volume other than TPH, FHP, N-TPH or TPF, and if so, please explain the meaning and use of these volume data.
- c. If you do confirm, please explain the reason no volumes were associated with the MODS Numbers for these operations.