

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 FRANK NERI
(APWU/USPS-T4-22-30)
(February 24, 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 Frank Neri (USPS-T-16). 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-T4-22 In your response to POIR 1 Q7 on your productivity calculations, you stated “Because the Postal Service must staff for an eight-hour tour, I found which hour of each tour required the most staffing and then compared the values for the needed complement busiest hour with the complement needed for the other hours of the tours.”

- a) Does your methodology assume that every person working during the peak load period of a particular tour is working for eight hours? If so, on what is that assumption based?
- b) Suppose 20-30 percent of the mail processing employees were working for periods shorter than eight hours; would that change your underlying assumption? If so, how much would your productivity estimates change?
- c) Does your methodology account for scheduling tools that set start times to result in higher staffing during peak hour by overlapping shifts?

APWU/USPS-T4-23 In your response to APWU/USPS-T4-2 (i-j) you state that there are no data sources that could be used to develop an appropriate class or product-wide representative O/D pair flow by delivery time period for periodicals, especially Within County and smaller periodicals mailers. What information is the Postal Service using to estimate the impact of the proposed changes on this group of mailers?

APWU/USPS-T4-24 In response to APWU/USPS-T4-3 you state that the impact on the delivery profile of Priority Mail could not be determined until the AMP studies were completed.

- a) Now that the AMP studies are completed, can you provide a better estimate of the impact of the proposed changes on the actual delivery profile of Priority Mail?
- b) Can you determine if the delivery of this product will now require stand-alone processing or transportation when it could previously be co-processed and co-transported with other classes of mail?

APWU/USPS-T4-25 In response to APWU/USPS-T4-4 you state that the impact on the delivery profile of Express Mail could not be determined until the AMP studies were completed.

- a) Now that the AMP studies are completed, can you provide a better estimate of the impact of the proposed changes on the actual delivery profile of Express Mail?
- b) Can you determine if the delivery of this product will now require stand-alone processing or transportation when it could previously be co-processed and co-transported with other classes of mail?

APWU/USPS-T4-26 In your response to TI/USPS-T4-1 you indicate that as many as 10 FSS machines might be moved. Has the completion of the AMPs clarified how many of the FSS machines will be moved if the full set of approved AMPs are implemented?

APWU/USPS-T4-27 There is no outgoing secondary sortation in your proposed operating plan (p. 22), is that because of longer operational windows or because there are fewer nodes in the network? If it is the latter, were the number of AMPs that were approved dependent on reducing the number of nodes to make that possible?

APWU/USPS-T4-28 Please describe the Postal Service's mail processing and transportation flows from origin entry, including retail where appropriate, to destination delivery unit for the following parcel mail products:

- a) First Class Lightweight Parcels
- b) Standard Mail Commercial Parcels
- c) Standard Mail Not Flat-Machinables
- d) Single Piece Parcel Post
- e) BPM Parcels
- f) Media and Library Mail Parcels

APWU/USPS-T4-29 For each process flow described in response to APWU/USPS-T4-28, please indicate the type of processing facility and the type of equipment used to process the parcels.

APWU/USPS-T4-30 For each product listed in APWU/USPS-T4-28(a-f) please provide the FY 2010 Origin 3-Digit Zip-to-Destination 3-Digit ZIP mail volumes for all origin-destination pairs.