

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 MARC A. SMITH  
(APWU/USPS-T9-16)  
(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 Marc A. Smith (USPS-T-9). 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-T9-16 With the February 23, 2012 identification of the approved AMPs, have you revised the estimates of mail processing equipment savings, facility related savings and workload reduction savings presented in your testimony? If you have done so, please provide the revised numbers. If you have not done so, please indicate when those can be expected.