

Before the
POSTAL REGULATORY COMMISSION
Washington, DC 20268-0001

Mail Processing Network Rationalization)
Service Changes, 2012) Docket No. N2012-1

NATIONAL POSTAL MAIL HANDLERS UNION INTERROGATORIES TO USPS WITNESS
EMILY R. ROSENBERG (NPMHU/USPS-T3-37-42)

Pursuant to Rule 26 of the Commission's Rules of Practice and Procedure, the National Postal Mail Handlers Union ("NPMHU") hereby submits the following interrogatories to USPS witness Emily R. Rosenberg. If necessary, please redirect any interrogatory to a more appropriate USPS witness.

Instructions and Definitions

"USPS" or "Postal Service" means the United States Postal Service, its employees, agents, witnesses, and all other persons who act under the direction of the United States Postal Service, including but not limited to consultants and other independent contractors.

"Mail Processing Network Rationalization Service Changes, 2012" or "MNPR" means the proposed restructuring of the USPS's mail distribution and transportation network presented to the PRC in its December 5, 2010 "Request of the United States Postal Service for an Advisory Opinion on Changes in the Nature of Postal Services."

“MNPR Network” means the mail distribution and transportation network required to implement the USPS’ MNPR and that, inter alia, accommodates the USPS’s elimination of 252 mail processing facilities.

“Documents” has the meaning as ascribed within the federal Rules of Civil Procedure and includes any documents or things that constitute or contain matters that are relevant to the subject matter of this proceeding and that are in the custody or control of the USPS.

“Losing facility” is defined and used herein in the same manner as it is defined and used in Section 1-1.2 of the PO-408 handbook.

“Gaining facility” is defined and used herein in the same manner as it is defined and used in Section 1-1.2 of the PO-408 handbook. The term document has the same meaning as ascribed within the federal Rules of Civil Procedure.

The term “person” means any natural person, corporation, partnership, proprietorship, association, organization or group of natural individuals.

The term “identify,” when used with regard to a person means to provide the full name, position, address and telephone number of the person.

The term “identify,” when used with regard to a document means to describe the subject matter of the document, its author, its date and any addressee.

INTERROGATORIES

NPMHU/USPS-T3-37 Please state whether you or anyone else at the Postal Service has run any models or simulations on the network that would result if the decisions announced by the Postal Service on February 23, 2012, and published at <http://about.usps.com/what-we-are-doing/our-future-network/assets/pdf/communications-list-022212.pdf> are implemented. If the answer is yes, please describe those models or simulations, and provide associated Library References. If the answer is no, please state whether there are any plans to do so.

NPMHU/USPS-T3-38 Please explain what steps the Postal Service has taken, or will take, to ensure that the network resulting from the AMP decisions announced on February 23, 2012, is a “rationalized” network that can process and distribute mail within the proposed revised service standards. If any such steps have been taken, please provide supporting documentation in the form of a library reference.

NPMHU/USPS-T3-39 Please confirm that the distribution network developed by the LogicNet model would not apply to the network that would result if the decisions announced on February 23, 2012, are implemented. If not confirmed, please explain how this network developed by the computer model would apply, given the differences between the network developed by the model and that resulting from the decisions announced on February 23, 2012.

NPMHU/USPS-T3-40 Please explain whether any computer modeling software will be used in the process of developing a distribution network in the network that would result if the decisions announced on February 23, 2012, are implemented, and, if so, what the role of that software will be.

NPMHU/USPS-T3-41 Please explain what steps, if any, the Postal Service has taken to resolve irrationalities identified in the model by the Step 4 (Deeper Dive Analysis)—e.g., calculations of optimality in the LogicNet model based on impossibilities like partial machines, in arriving at the network announced by the Postal Service on February 23, 2012. If no steps have been taken, please identify the individual(s) who made the determination that modification of the

model based on Step 4 was no longer needed and describe in detail the process by which the determination was made.

NPMHU/USPS-T3-42 Please confirm that the Postal Service completed the building layout review and approval process described on page 18, footnote 25 of your testimony and incorporated this analysis into the network announced by the Postal Service on February 23, 2012. If not confirmed, please identify the individual(s) who decided that the building layout review was no longer necessary and describe in detail the process by which this determination was made. If confirmed, please provide the documents associated with this review as a Library Reference.

Respectfully submitted,

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