

Before the
POSTAL REGULATORY COMMISSION
Washington, DC 20268-0001

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

NATIONAL POSTAL MAIL HANDLERS UNION INTERROGATORIES TO USPS
WITNESS FRANK NERI (NPMHU/USPS-T4-21-22)

Pursuant to Rules 25 through 28 of the Commission’s Rules of Practice and Procedure, the National Postal Mail Handlers Union (“NPMHU”) hereby submits the following interrogatories to USPS witness Frank Neri, USPS-T4. If the witness is unable to respond to any interrogatory, please redirect the 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” (MPNR) or 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 – T-4-21 Please explain in detail what effect, if any, the USPS decisions on the AMP studies announced on February 23, 2012, and published at <http://about.usps.com/what-we-are-doing/our-future-network/assets/pdf/communications-list-022212.pdf> have on your estimates of productivity improvements, contained on page 29 of your testimony. If there is no effect, please explain why your productivity estimates are not affected by these decisions.

NPMHU/USPS – T-4-22 Referring to page 28 of your testimony, you state that “[r]educing to less than 200 sorting facilities allows for the elimination of AADC and ADC sortation.” Assuming that the decisions announced 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, how many sorting facilities will there be in the Postal network?

Respectfully submitted,

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As agent for and authorized by

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February 24, 2012