

Before the  
POSTAL REGULATORY COMMISSION  
Washington, DC 20268-0001

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Mail Processing Network Rationalization	)	Docket No. N2012-1
Service Changes, 2012	)	
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NATIONAL POSTAL MAIL HANDLERS UNION INTERROGATORIES TO USPS  
WITNESS MARC SMITH (NPMHU/USPS-T-9-1-3)

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 Marc Smith, USPS-T-9. 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 - T-9-1 In your response to APWU/USPS-T9-10, you acknowledge that “[t]o the extent AMP studies led to cost savings that occurred in or before FY2010, they would not be included in my baseline.” Please provide data sufficient to calculate such cost savings.

NPMHU/ USPS - T-9-2 Referring to Table 16 in the testimony of Michael Bradley, and Witness Bradley’s response to NPMHU/USPS-T-10-7, in which he states that “the cost changes from workload reduction are calculated by witness Smith and are incorporated into my testimony solely for the purpose of cumulating the overall changes in cost,” please explain:

- a) Why the savings achieved through “workload reduction” cost changes are not redundant or overlapping with the savings achieved through “workload transfer.”
- b) Why the savings achieved through “workload reduction” cost changes are not redundant or overlapping with the savings achieved through productivity gains.
- c) What data supports the calculations for each category of “workload reduction” cost changes.

NPMHU/ USPS - T-9-3 Referring to the list of planned facility consolidations published by the Postal Service on February 23, 2012 at <http://about.usps.com/what-we-are-doing/our-future-network/assets/pdf/communications-list-022212.pdf>, please:

- a) Given that the Postal Service has decided that only forty of the 252 potential consolidations should be fully closed, how does that affect your calculations of cost savings?
- b) Given that the Postal Service has not approved approximately forty-one out of the 252 potential consolidations, how does that affect your calculations of cost savings?
- c) Please provide updated cost savings, with supporting data in the form of Library References, based upon all the consolidation decisions contained in the Postal document at <http://about.usps.com/what-we-are-doing/our-future-network/assets/pdf/communications-list-022212.pdf>.

Respectfully submitted,

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