

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 KEVIN RACHEL
(APWU/USPS-T8-3-4)
(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 Kevin Rachel (USPS-T-8). 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-T8-3 Please confirm that in the implemented Daytona to Mid-FL AMP approved February 4, 2011

- a) 29 maintenance employees were reassigned;
- b) 20 of those employees were given saved grade because their new assignments were at a lower level.
- c) The original AMP made no estimate of such costs.
- d) The PIRs did not consider those ongoing costs.

If you do not confirm, please provide the correct numbers with any necessary explanation.

APWU/USPS-T8-4 Please confirm that in the implemented Daytona to Mid-FL AMP approved February 4, 2011, 25 reassigned clerks received paid training:

- a) 8 received window training,
- b) 8 received both window and scheme training,
- c) 5 received training on keying on parcel machine,
- d) 2 received scheme training,
- e) 2 received BMEU training in residence at Norman OK,
- f) The original AMP made no estimate of such costs.
- g) The PIRs did not consider these costs.

If you do not confirm, please provide the correct numbers with any necessary explanation.