

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

**MAIL PROCESSING NETWORK
RATIONALIZATION SERVICE CHANGES, 2012**

Docket No. N2012-1

**MOTION OF AMERICAN POSTAL WORKERS UNION, AFL-CIO
FOR LEAVE TO FILE RESPONSE TO USPS REPLY TO
APWU MOTION TO PRODUCE A POLICY WITNESS
(March 12, 2012)**

Pursuant to 21(b) of the Commission's Rules of Practice and Procedure the American Postal Workers Union, AFL-CIO (APWU) respectfully requests leave to file the Response to USPS Reply to APWU Motion to Produce a Policy Witness, also filed with the Commission today.

The Postal Service Reply to APWU's Motion, filed March 9, 2012, contained several statements that we submit are inaccurate or misleading. However, information to refute or correct these statements is not currently before the Commission. The Response APWU files today includes reference to Postal Service statements outside of this docket, including those in its recently released business plan titled "Plan to Profitability" and statements made in other cases before the Commission, that have direct bearing on the APWU's Motion to Compel a Witness and contradict the Postal Service's position in its Reply to APWU's Motion. APWU submits that the Presiding Officer should examine this additional information in light of the Postal Service's claims in its Reply before rendering a decision on APWU's Motion.

The APWU's Response is being filed one business day after the Postal Service filed its Reply. APWU submits that consideration of our response should not unduly delay the Presiding Officer's decision on our Motion.

Therefore, APWU requests that it be permitted to file a Response to the Postal Service Reply to our Motion to Compel a Policy Witness.

Respectfully submitted,

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