

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

Mail Processing Network Rationalization
Service Changes, 2012

Docket No. N2012-1

AMERICAN POSTAL WORKERS UNION, AFL-CIO,
MOTION FOR ACCESS TO
NON-PUBLIC INFORMATION IDENTIFIED
AS USPS-LR-N2012-1/ NP17
(March 19, 2012)

On March 16, 2012, American Postal Workers Union, AFL-CIO (APWU), filed a Motion for Access to Non-Public Information Identified as USPS-LR-N2012-1/NP17. Accompanying this Motion was the signed certifications of several APWU representatives, consultants and attorneys. Due to the urgent nature of the filing, one APWU consultant was unable to complete their Statement of Compliance with Protective Conditions Certifications pursuant to 30 CFR 3007.40(b) in time to be included in the filing. A certification for USPS-LR-N2012-1/NP17 for the following individual has now been completed:

Jim Lynch
Shorter Cycles
Senior Consultant
Consultant for American Postal Workers Union, AFL-CIO

A copy of the Certification is attached hereto.

For the reasons stated in our March 16, 2012 Motion for Access, APWU respectfully requests that the above named individual be granted immediate access to the non-public Library Reference USPS-LR-N2012/1NP17.

Persons identified by the Postal Service pursuant to Section 3007.2(c) have been provided with a copy of this Motion and accompanying certification today by email.

Conclusion

For the forgoing reasons and the reasons stated in APWU's Motion for Access, filed March 16, 2012 APWU respectfully requests that access to Library Reference USPS-LR-N2012-1/NP17 granted to the above named individual.

Respectfully submitted,

Jennifer L. Wood
Counsel for American Postal Workers Union, AFL-CIO