

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 UNITED STATES POSTAL SERVICE
(APWU/USPS-23-25)
(April 6, 2012)**

Pursuant to Rules 25 through 28 of the Rules of Practice, American Postal Workers Union, AFL-CIO (“APWU”) directs the following interrogatories, which seeks information relevant to the rebuttal testimony of the APWU, to the United States Postal Service.

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-23 Please refer to USPS-LR-N2012-1/NP11. Please clarify the following data fields and/or values in the ODIS record layout definition:

- a) Indicia = 3: what type of indicia does this represent (e.g., Permit account, etc.)?
- b) Priority Indicator: please provide additional clarification on the meaning of 'Identified Priority' and 'Unidentified Priority'
- c) Service Standard = 0: please explain the conditions for Service Standard to be equal to 0 (zero).

APWU/USPS-24 Please refer to USPS-LR-N2012-1/NP11. In the ODIS data file, some Service Standard fields for some O-D pairs are blank. Please provide an explanation for the reason these fields are blank.

APWU/USPS-25 In the USPS response to POIR No. 5 Question 4, the Excel spreadsheet provided has identified Primary Processing Centers for Letters, Flats, and Priority. Please modify/update the Excel spreadsheet to include:

- a) Processing centers for Priority Parcels;
- b) Processing centers for Priority Flats/Letters;
- c) Processing centers for Non-Priority Parcels.