

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

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

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**Docket No. N2012-1**

**INTERROGATORIES OF THE AMERICAN POSTAL WORKERS UNION, AFL-CIO  
TO USPS WITNESS MICHAEL BRADLEY  
(APWU/USPS-T10-12-13)  
(April 6, 2012)**

Pursuant to Rules 25 through 28 of the Rules of Practice, American Postal Workers Union, AFL-CIO directs the following interrogatories the following interrogatories which seek information relevant to the rebuttal testimony of the APWU, to United States Postal Service witness Michael Bradley (USPS-T-10). 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-T10-12 In estimating the additional HCR costs shown on Table 14, have you used the average accrued costs for all Intra-P&DC routes or just for ones that are in the geographic areas listed in USPS-LR-N2012-1/22?

APWU/USPS-T10-13 In assessing the hours and wage costs in your analysis, did you take in to account:

- a) the changes in the 2010 APWU contract that impacted the average hourly wage cost for PVS service?
- b) any changes that the Postal Service has undertaken to reduce the number of PVS and HCR routes because of USPS OIG audit findings?