

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

MAIL PROCESSING NETWORK RATIONALIZATION
SERVICE CHANGES, 2011

Docket No. N2012-1

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS NERI TO
AMERICAN POSTAL WORKERS UNION, AFL-CIO INTERROGATORY
(APWU/USPS-T4—32)
(April 9, 2012)**

The United States Postal Service provides the response of witness Neri (USPS-T-4) to the above-listed interrogatory of the American Postal Workers Union, AFL-CIO, dated March 13, 2012. The interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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April 9, 2012

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APWU/USPS-T4-32 Please refer to your response to APWU/USPS-T5-6(d) redirected to you from Witness Bratta. Please explain why the lost value of excess equipment that is stored, disposed of, or sold for less than its value not accounted for in the AMP study or PIR.

RESPONSE:

An AMP accounts for the removal or disposal of a piece of equipment only if it is required to complete the consolidation. The scope of the AMP analysis is limited to functions required for the movement of mail. The AMP process does not consider costs or benefits related to functions that are not required for the movement of mail in order to avoid a distortion of the business case concerning consolidation.