

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

MAIL PROCESSING NETWORK
RATIONALIZATION SERVICE CHANGES, 2011

Docket No. N2012-1

OBJECTION OF THE UNITED STATES POSTAL SERVICE TO AMERICAN POSTAL
WORKERS UNION INTERROGATORIES APWU/USPS-T10-12 AND 13
(April 13, 2012)

The United States Postal Service hereby objects to the above-listed interrogatories of the American Postal Workers Union, AFL-CIO, filed on April 6, 2012. The interrogatories are reproduced below and followed by a statement of the basis for the objection.

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?

Discovery on the Postal Service's direct case closed on February 24, 2012.¹

Both interrogatories refer to and entirely relate to witness Bradley's direct testimony.

APWU has offered no explanation as to why it did not or could not submit these

¹ Presiding Officer's Ruling N2012-1/5, Presiding Officer's Ruling Establishing Procedural Schedule, Docket No. N2012-1 (Jan. 12, 2012). While the Commission later issued an updated schedule, the updated schedule did not change the deadline for discovery on the Postal Service's direct case. Order No. 1301, Order Concerning Scheduling of Updated Postal Service Testimony, Docket No. N2012-1 (Mar. 29, 2012). APWU appears to be attempting to improperly use the updated schedule's deadline for the close of discovery for developing intervenors' direct case (April 6, 2012) to continue to conduct witness-directed discovery.

interrogatories by the February 24th deadline, nor has it explained why it should now be permitted to unilaterally extend discovery on the Postal Service's direct case a full six weeks beyond the deadline. Accordingly, the Postal Service objects to these interrogatories.

Furthermore, as a practical matter, the Postal Service notes that the two interrogatories simply repeat prior interrogatories to which witness Bradley has already provided sufficient responses. Specifically, APWU/USPS-T10-12 is a verbatim reproduction of APWU/USPS-T10-8, and APWU/USPS-T10-13 is a near verbatim reproduction of APWU/USPS-T10-11(a) and (c). Responses to these interrogatories were filed on February 16, 2012. It is not clear what would be gained by asking them again.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Pricing & Product Support

Nabeel R. Cheema

475 L'Enfant Plaza, S.W.
Washington, D.C. 20260-1137
(202) 268-7178; Fax -5402
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