

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,
SUPPLEMENTAL MOTION FOR ACCESS TO NON-PUBLIC INFORMATION
IDENTIFIED AS USPS-LR-N2012-1/NP26 AND NP27
(May 22, 2012)**

On May 17, 2012, American Postal Workers Union, AFL-CIO (APWU), filed a Motion for Access to Non-Public Information Identified as USPS-LR-N2012-1/NP27 and on May 21, 2012, the APWU filed a Motion for Access to Non-Public Information Identified as USPS-LR-N2012-1/NP26. Accompanying both of these motions were the signed certifications of several APWU representatives, consultants and attorneys. However, several APWU consultants and attorneys were 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. Certifications applicable to USPS-LR-N2012-1/NP26 and NP27, for the following individuals have now been completed as follows:

USPS-LR-N2012-1/NP26:

Kathryn Kobe,
Director of Price, Wage and Productivity Analysis ECS, LLC
Economic Consultant for American Postal Workers Union, AFL-CIO

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

USPS-LR-N2012-1/NP27:

Kathryn Kobe,
Director of Price, Wage and Productivity Analysis ECS, LLC
Economic Consultant for American Postal Workers Union, AFL-CIO

Darryl J. Anderson, Esq.
O'Donnell, Schwartz & Anderson, PC
Counsel for the American Postal Workers Union, AFL-CIO

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

A copy of each Certification is attached hereto.

Counsel for APWU has conferred with USPS and has been assured that it does not object to these individuals accessing the information contained in USPS-LR-N2012-1/NP26 and NP27. For this reason and for those reasons stated in our May 17 and 22, 2012, Motions for Access, APWU respectfully requests that the above named individuals be granted immediate access to the non-public Library References USPS-LR-N2012/1NP26 and NP27.

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

Conclusion

For the forgoing reasons and the reasons stated in APWU's Motion for Access, filed May 17, 2012 and the Motion for Access filed May 21, 2012, APWU respectfully requests that access to Library Reference USPS-LR-N2012-1/NP26 and NP27 be granted to the above named individuals.

Respectfully submitted,

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

CERTIFICATION

The undersigned represents that:

Access to these materials provided in the matter identified as **USPS-LR-N2012-1/NP26** by the Postal Service has been authorized by the Commission. The cover or label of the copy obtained is marked with my name. I agree to use the information only for purposes of analyzing matters at issue in the matter identified as **PRC Docket No. N2012-1**. I certify that I have read and understand the above protective conditions and am eligible to receive access to materials under paragraph 1 of the protective conditions. I further agree to comply with all protective conditions and will maintain these materials in strict confidence in accordance with all of the protective conditions set out above.

Name Kathryn Kobe

Firm ECS, LLC

Title Director of Price, Cost, Productivity Analysis

Representing APWU

Signature Kathryn L Kobe

Date May 22, 2012

CERTIFICATION

The undersigned represents that:

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Name Jim Lynch
Firm Shorter Cycles, LLC
Title Senior Consultant
Representing APWU
Signature 
Date 5/17/12

CERTIFICATION

The undersigned represents that:

Access to these materials provided in the matter identified as **USPS-LR-N2012-1/NP27** by the Postal Service has been authorized by the Commission. The cover or label of the copy obtained is marked with my name. I agree to use the information only for purposes of analyzing matters at issue in the matter identified as **PRC Docket No. N2012-1**. I certify that I have read and understand the above protective conditions and am eligible to receive access to materials under paragraph 1 of the protective conditions. I further agree to comply with all protective conditions and will maintain these materials in strict confidence in accordance with all of the protective conditions set out above.

Name Kathryn Kobe

Firm ECS, LLC

Title Director of Price, Cost, Productivity Analysis

Representing APWU

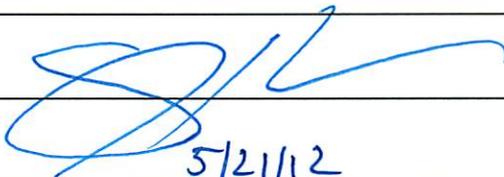
Signature Kathryn L Kobe

Date May 22, 2012

CERTIFICATION

The undersigned represents that:

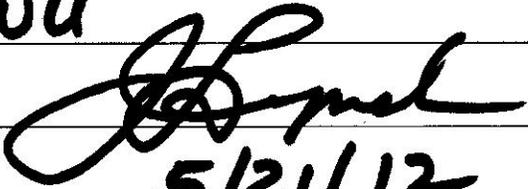
Access to these materials provided in the matter identified as **USPS-LR-N2012-1/NP27** by the Postal Service has been authorized by the Commission. The cover or label of the copy obtained is marked with my name. I agree to use the information only for purposes of analyzing matters at issue in the matter identified as **PRC Docket No. N2012-1**. I certify that I have read and understand the above protective conditions and am eligible to receive access to materials under paragraph 1 of the protective conditions. I further agree to comply with all protective conditions and will maintain these materials in strict confidence in accordance with all of the protective conditions set out above.

Name	Darryl J. Anderson
Firm	O'Donnell, Schwartz & Anderson, P.C.
Title	Attorney
Representing	APWU
Signature	
Date	5/21/12

CERTIFICATION

The undersigned represents that:

Access to these materials provided in the matter identified as USPS-LR-N2012-1/NP27 by the Postal Service has been authorized by the Commission. The cover or label of the copy obtained is marked with my name. I agree to use the information only for purposes of analyzing matters at issue in the matter identified as PRC Docket No. N2012-1. I certify that I have read and understand the above protective conditions and am eligible to receive access to materials under paragraph 1 of the protective conditions. I further agree to comply with all protective conditions and will maintain these materials in strict confidence in accordance with all of the protective conditions set out above.

Name	<u>Jim Lynch</u>
Firm	<u>ShorterCycles, LLC</u>
Title	<u>Senior Consultant</u>
Representing	<u>APWU</u>
Signature	<u></u>
Date	<u>5/21/12</u>