

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

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MAIL PROCESSING NETWORK  
RATIONALIZATION SERVICE  
CHANGES, 2011

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Docket No. N2012-1

**RESPONSE OF WITNESS JAMES HAGGARTY (NPMHU-T-4) TO UNITED STATES  
POSTAL SERVICE FIRST SET OF INTERROGATORIES AND REQUESTS FOR  
PRODUCTION TO NATIONAL POSTAL MAIL HANDLERS UNION WITNESS  
HAGGARTY (USPS/NPMHU-T4-1-6)**

(June 6, 2012)

The NPMHU submits the following responses to the United States Postal Service's interrogatories and requests for production to National Postal Mail Handlers Union witness James Haggarty (NPMHU-T-4-1-6), filed May 23, 2012. Each interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

Patrick T. Johnson

*As agent for and authorized by*

/s/ Kathleen M. Keller

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Union*

June 6, 2012

RESPONSES OF NPMHU WITNESS HAGGARTY TO  
POSTAL SERVICE INTERROGATORIES

**USPS/NPMHU-T4-1:** On page 2; lines 8 through 10 of your testimony, you state:

[t]he Postal Service . . . has not budgeted for adequate staffing to operate these hubs.

- a. Please state your understanding of whether the Postal Service included, in the respective AMP studies, calculations for future staffing levels in each of the ten Postal Service facilities identified on page 2 of your testimony.
- b. Please produce any documents or data that you relied upon in support of the above quoted statement from your testimony.

**RESPONSE:**

a. It is my understanding that the Postal Service included its calculations for future staffing levels in the respective AMP studies. My testimony questions whether the Postal Service has underestimated the staffing required.

b. I relied upon the AMP studies for the facilities in question. I also relied upon current and historical staffing levels at the Flint, Michigan hub, which was the first hub in my Local's jurisdiction. Attached is a sheet from the 2011 Flint P&DC AMP, showing the Postal Service's plans for 15 Mail Handlers to staff the hub, and a staffing report document listing the current Mail Handler staffing for facilities in southeast Michigan, showing the current staffing levels of 19 Mail Handlers in Flint.

RESPONSES OF NPMHU WITNESS HAGGARTY TO  
POSTAL SERVICE INTERROGATORIES

**USPS/NPMHU-T4-2:** On page 2, lines 17 through 19 of your testimony, you state “Mail Handlers perform many allied duties in support of the letter carriers, so more carrier normally would mean more Mail Handler work. In addition to mail handlers, describe, in detail, what other Postal Service employees and contractors support letter carriers by, among other tasks, removing containers from trucks and moving containers throughout Postal Service facilities, including but not limited to Function 4 facilities.

**RESPONSE:**

The work referenced in this question is core Mail Handler work. Under the Mail Processing Work Assignment Guidelines (pages 153 through 175 of the National Agreement), Section II.B., if there are not four or more hours of continuous work consisting of one or more functions in one or more operations designated to the primary craft, the Postal Service may assign the work to an employee outside of that primary craft. Therefore, in Function 4 facilities that have less than four (4) hours of Mail Handler work and where there are no Mail Handlers assigned, contract drivers and other USPS employees may do Mail Handler work. However, that would not be the case in the facilities discussed in my testimony, as these facilities are currently staffed with Mail Handlers. In those facilities, historical practice would control, and any additional Mail Handler work should be performed by Mail Handlers. To do otherwise, would violate the CBA, as well as current jurisdictional guidelines and assignments in these facilities, which could result in a monetary liability for the Postal service.

RESPONSES OF NPMHU WITNESS HAGGARTY TO  
POSTAL SERVICE INTERROGATORIES

**USPS/NPMHU-T4-3:** On page 3, lines 12 through 13 of your testimony, you state:

[w]hen they are not adhered to, the machines tend to break down more often and for longer periods of time, interrupting the normal process.

- a. Please describe, in detail, your experience, education, or training related to the maintenance procedures, routines or operating parameters of mail processing equipment used by the Postal Service, including but not limited to that mail processing equipment located at the Grand Rapids, Michigan P&DC.
- b. Please produce any documents or data that you relied upon in support of the above quoted statement.

**RESPONSE:**

- a. My experience is detailed in the first paragraph of my testimony. I do not have any formal education or training in the technical fields referenced. My testimony is based upon my many years of experience as a Mail Handler working in Postal facilities using the equipment in question, and my many years of experience representing Mail Handlers in Postal facilities across Michigan. In particular, my home facility, Grand Rapids, did try a 20 hour operational window in 2002 and they also tried a 17 hour operational window in 2008. Neither of these plans worked, in large part because of the problems with equipment breakdowns. The 2002 plan was abandoned in 2003, and the 2008 plan was abandoned in 2009. As the Branch President and active Steward in Grand Rapids, I did witness these breakdowns and did have multiple conversations with the maintenance mechanics that were tasked to repair the machinery.
- b. We do not represent the mechanics, so no documentation was gathered concerning the breakdowns at the time.

RESPONSES OF NPMHU WITNESS HAGGARTY TO  
POSTAL SERVICE INTERROGATORIES

**USPS/NPMHU-T4-4:** On page 3, lines 14 through 16 of your testimony, you state that you had “conversations with Postal Management” regarding “the substantial risk of increased equipment failure.”

- a. Please describe, in detail, your conversations with Postal Service management, regarding the substantial risk of increased equipment failure, including but not limited to the identity of the individuals with whom the conversations occurred, the time when the conversations occurred, the location of the conversations, and the mode of communication for the conversations, be it in-person, telephonic or by any other means.
- b. Please produce any documents relating to those conversations.

**RESPONSE:**

- a. I have repeatedly reminded Greater Michigan management about this. It was our history and I did not want them to repeat it. The vast majority of these conversations were in person. I have stated this to former District Manager Nancy Rittenhouse, current District Manager Lee Thompson, Complement coordinator Sherie Fuss, Inplant support manager Alan Snyder and former Labor relations manager Rich Howard. I have brought this up at each and every meeting concerning the AMP's, Realignment and changes to the service standards. I have also brought this up in the Detroit district as a warning and example to what happens when these machines do not get the required maintenance.
- b. None.

RESPONSES OF NPMHU WITNESS HAGGARTY TO  
POSTAL SERVICE INTERROGATORIES

**USPS/NPMHU-T4-5:** On page 3, lines 17 through 20 of your testimony, you state:

[t]he most baffling aspect of the AMP studies is that the Postal Service is claiming that it will save money on current transportation costs by trucking mail, an average of one hour and twenty minutes to another facility to be processed, and then trucking it back to be delivered.

- a. Please describe, in detail, your experience, education, or training related to the logistics management and transportation of mail between Postal Service facilities, including but not limited to the costs and savings analyses of transporting mail to or from the ten Postal Service facilities identified on page 2 of your testimony.
- b. Please produce any documents or data that you relied upon in support of the above quoted statement.

**RESPONSE:**

- a. My experience is detailed in the first paragraph of my testimony. My testimony is based upon my many years of experience as a Mail Handler working in Postal facilities, my many years of experience representing Mail Handlers in Postal facilities across Michigan, and my twenty year residence in the state of Michigan. I do not have any formal education or training in the technical fields referenced.
- b. I relied on the AMP studies for the referenced facilities.

RESPONSES OF NPMHU WITNESS HAGGARTY TO  
POSTAL SERVICE INTERROGATORIES

**USPS/NPMHU-T4-6:** On page 3, lines 23 through 23 of your testimony, you state:

[a] viable business model does not decrease customer service as a means of sustaining a customer base.

- a. Please describe, in detail, your experience, education, or training related to business models, plans or strategies and other economic tools used to develop and explore business opportunities and values, including but not limited to your experience, education, or training to support your statement.
- b. Please produce any documents or data that you relied upon in support of your statement.

**RESPONSE:**

- a. My experience is detailed in the first paragraph of my testimony. My testimony is based upon my many years of experience as a Mail Handler working in Postal facilities, my many years of experience representing Mail Handlers in Postal facilities across Michigan, my many years as a user of Postal services, and my common sense. I do not have any formal education or training in the technical fields referenced.
- b. None.

# **Attachment 1**

# Staffing - Craft

Last Saved: September 2, 2011

Losing Facility: Flint P&DC

Data Extraction Date: 11/24/10

Finance Number: [REDACTED]

Craft Positions	(1) Casuals On-Rolls	(2) Part Time On-Rolls	(3) Full Time On-Rolls	(4) Total On-Rolls	(5) Total Proposed	(6) Difference
Function 1 - Clerk	0	1	127	128	3	(125)
Function 4 - Clerk	0	0	0	0	0	0
Function 1 - Mail Handler	1	1	36	38	15	(23)
Function 4 - Mail Handler	0	0	0	0	0	0
<b>Function 1 &amp; 4 Sub-Total</b>	<b>1</b>	<b>2</b>	<b>163</b>	<b>166</b>	<b>18</b>	<b>(148)</b>
Function 3A - Vehicle Service	0	0	0	0	0	0
Function 3B - Maintenance	0	0	56	56	24	(32)
Functions 67-69 - Lmt/RehabW/C	0	0	0	0	0	0
Other Functions	0	0	3	3	0	(3)
<b>Total</b>	<b>1</b>	<b>2</b>	<b>222</b>	<b>225</b>	<b>42</b>	<b>(183)</b>

Retirement Eligibles: 37

Gaining Facility: Michigan MetroPlex P&DC

Finance Number: [REDACTED]

Data Extraction Date: 11/24/10

Craft Positions	(7) Casuals On-Rolls	(8) Part Time On-Rolls	(9) Full Time On-Rolls	(10) Total On-Rolls	(11) Total Proposed	(12) Difference
Function 1 - Clerk	35	21	502	558	591	33
Function 1 - Mail Handler	0	18	214	232	259	27
<b>Function 1 Sub-Total</b>	<b>35</b>	<b>39</b>	<b>716</b>	<b>790</b>	<b>850</b>	<b>60</b>
Function 3A - Vehicle Service	0	5	21	26	26	0
Function 3B - Maintenance	0	0	245	245	263	18
Functions 67-69 - Lmt/RehabW/C	0	0	7	7	7	0
Other Functions	0	0	5	5	5	0
<b>Total</b>	<b>35</b>	<b>44</b>	<b>994</b>	<b>1,073</b>	<b>1,151</b>	<b>78</b>

Retirement Eligibles: 208

Total Craft Position Loss: 105 (This number carried forward to the Executive Summary)

(13) Notes:

EX 11052908

USPS FIN 25-8233  
 MINNEAPOLIS ISSC  
 REPORT AAW90DP1 SFX  
 PRC 481

SOUTHEAST MICHIGAN PFC

MAIL HANDLER AGREEMENT (SECTION 7.1)  
 PAY PERIOD 11, FY 2012

DATE 05/22/2012  
 PAGE 1

FINANCE NUMBER	INSTALLATION	MH		MH		\$		MH		\$		MH		MH	
		CAREER ON-ROLLS	CASUAL ON-ROLLS	CAS/CAR ON-ROLLS	CAREER PAID	CASUAL PAID	CAS/CAR PAID	CASUAL HOURS	DMU/CASUAL ON-ROLLS						
25-0280	ANN ARBOR	3	0	0.000	3	0	0.000	0.00	0	0	0	0	0	0	0
25-2400	DEARBORN	2	0	0.000	2	0	0.000	0.00	0	0	0	0	0	0	0
25-2489	ROMULUS	44	2	0.045	40	2	0.050	129.99	0	0	0	0	0	0	0
25-2490	DETROIT	249	30	0.120	231	29	0.126	1,995.64	0	0	0	0	0	0	0
25-2491	ALLEN PARK	198	9	0.045	193	8	0.041	460.59	0	0	0	0	0	0	0
25-3290	FLINT	19	0	0.000	19	0	0.000	0.00	0	0	0	0	0	0	0
25-4800	JACKSON	10	0	0.000	10	0	0.000	0.00	0	0	0	0	0	0	0
25-8230	ROYAL OAK	257	36	0.140	247	27	0.109	2,063.42	0	0	0	0	0	0	0