

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

MAIL PROCESSING NETWORK
RATIONALIZATION SERVICE CHANGES, 2012

DOCKET No. N2012-1

**REVISED RESPONSE OF POSTAL SERVICE WITNESS MARTIN TO
NATIONAL POSTAL MAIL HANDLERS UNION INTERROGATORY
(NPMHU/USPS-T6-18) [ERRATUM]**

The Postal Service hereby gives notice of the filing of erratum to Postal Service Witness Martin's February 2, 2012, response to National Postal Mail Handlers Union Interrogatories (NPMHU/USPS-T6-18). The attached, revised response supersedes the response filed on February 2, 2012.

Respectfully submitted,

UNITED STATES POSTAL SERVICE
By its attorneys:

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**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MARTIN
TO NATIONAL POSTAL MAIL HANDLERS UNION INTERROGATORY**

NPMHU/USPS-T6-18. For each Gaining Facility in the MNPR Network, and assuming that any pending AMP studies related to that Gaining Facility are approved, provide the number and size of the PVS or HCR vehicles that would daily load and unload mail at that facility according to the MNPR and the time frame for such loading and unloading.

RESPONSE:

In my initial response to this interrogatory, filed on February 2, 2012, I stated that I intended to provide a full and complete response to this interrogatory within a reasonable period of time after the announcement of all final decisions concerning the AMP reviews associated with this docket. When I responded to this interrogatory I expected to obtain a comprehensive transportation profile for each gaining facility that would have incorporated the added "new" service along with the remaining service to identify the total number of inbound and outbound trips by vehicle size. However, the majority of AMP proposals submitted for review only included the impacted routes and was not inclusive of all service that would operate in the new environment at the gaining facility. At this time, I cannot provide the information sought by this interrogatory.