

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

**Rate and Service Changes To Implement
Baseline Negotiated Service Agreement
With Life Line Screening**

Docket No. MC2007-5

**AMERICAN POSTAL WORKERS UNION, AFL-CIO FOLLOW-UP
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS MICHELLE K. YORGEY
(APWU/USPS-T1-6-8)
(December 5, 2007)**

Pursuant to Rules 25 through 28 of the Commission's Rules of Practice, the American Postal Workers Union, AFL-CIO (APWU) directs the following follow-up interrogatories to USPS witness Michelle K. Yorgey. If the witness is unable to provide a response to these interrogatories, APWU requests that a response be provided by an appropriate person capable of providing an answer.

Respectfully submitted,

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

O'Donnell, Schwartz & Anderson, P.C.
1300 L Street NW Suite 1200
Washington, DC 20005-4126
Voice: (202) 898-1707
Fax: (202) 682-9276
JWood@odsalaw.com

APWU/USPS-T1-6 In your response to APWU/USPS-T1-5 you indicated that the actual 2007 volumes mailed by Life Line Screening were almost 11 percent above the original estimates for the year.

- a) When did the Postal Service become aware of the fact that the actual volume was going to be substantially above what was expected for the year?
- b) Did Life Line Screening ever discuss the expected impact this new business development partner would have on its mail volume in 2007 with the Postal Service?
- c) Has Life Line Screening provided the Postal Service with any estimates of the potential impact this new development partner might have on the base line volumes in other years?

APWU/USPS-T1-7 In your response to APWU/USPS-T1-5 you indicate that Life Line Screening has informed the Postal Service that it will discontinue operations of six of its vans in early 2008. Was that the main reason for the original estimate of a 6 million piece decline in its base line estimates between 2007 and 2008?

APWU/USPS-T1-8 Given that some of the business assumptions used in the original financial analysis are now different, have you estimated the financial gains and losses for the Postal Service under the assumption that:

- a) Life Line Screening mails the same amount during the forecast period as it mailed in 2007?
- b) Has Life Line Screening provided a new baseline with which to evaluate this deal given the changes in its business that have recently taken place?
- c) If so, have you made new financial estimates using those projections and what do they show?
- d) If not, why hasn't the Postal Service requested such information since it seems circumstances would lead to an outcome different than the one the Postal Service assumed in its original calculations?