

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

STATION AND BRANCH OPTIMIZATION AND
CONSOLIDATION INITIATIVE, 2009

Docket No. N2009-1

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS VANGORDER
TO PUBLIC REPRESENTATIVE INTERROGATORY
PR/USPS-T1-14
(September 8, 2009)

The United States Postal Service hereby provides the responses of witness Alice VanGorder to Public Representative interrogatory PR/USPS-T1-14, which was filed on September 2, 2009. The interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS VANGORDER
TO INTERROGATORY OF THE PUBLIC REPRESENTATIVE**

PR/USPS-T1-14

Please refer to your August 31, 2009 revised response to PR/USPS-T1-11(a-c). Please define the terms “closed” (plus “close” and “closure”), “consolidated” (plus “consolidate” and “consolidation”), and “discontinue” (plus “discontinued” and “discontinuance”) as used in your response, and discuss and explain the similarities and difference between each term. For example, will every “closure” of a station or branch result in a “consolidation” of some type? Please explain.

RESPONSE

In terms of this Initiative, the terms “closed” “close” “closure” “discontinue”, “discontinued” and “discontinuance” refer to the permanent discontinuance of a retail unit without providing a replacement retail postal facility in the community. In such a case, retail postal services would be provided by neighboring retail postal units, alternate access locations, or carriers.

The terms “consolidated,” “consolidate” and “consolidation” in my responses refer to the elimination of carrier operations at that location, which may involve moving them to a carrier annex or other neighboring facility. As explained in my response in PR/USPS-T1-11(a-c), not every retail “closure” will result in a “consolidation” of the carrier operations at that location.