

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

STATION AND BRANCH OPTIMIZATION AND  
CONSOLIDATION INITIATIVE, 2009

Docket No. N2009-1

UNITED STATES POSTAL SERVICE NOTICE OF FILING OF ERRATA  
IN RESPONSE OF WITNESS VANGORDER TO  
PUBLIC REPRESENTATIVE INTERROGATORY PR/USPS-T1-12(b)  
(September 29, 2009) [ERRATA]

The United States Postal Service hereby provides notice of errata in the answer of witness Alice VanGorder to the following Public Representative interrogatory: PR/USPS-T1-12(b). A corrected response is attached. There are no changes in the answers to subparts (a) or (c). The attached revised response to PR/USPS-T1-12 supersedes the answer filed on September 4, 2009.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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

**Revised: September 29, 2009**

**PR/USPS-T1-12**

Please refer to your response to APWU/USPS-T1-2(d) where you state “As part of each discontinuance study, the Postal Service estimates the costs expected to be saved by the elimination of the provision of service at a particular location.”

- a. Does the Postal Service consider loss of revenue from the closure of that particular location in determining whether to close a particular facility? Please explain.
- b. Are the “cost expected to be saved” referenced in your response to APWU/USPS-T1-2(d) net cost savings?
- c. If the Postal Service does not consider loss of revenue from the closure of a particular location in calculating the net cost savings, is the Postal Service assuming that all business lost at that particular facility will migrate to other postal facilities or alternate access channels? If not, please explain.

**RESPONSE**

- a. No. The Postal Service is unaware of any reliable methodology for estimating the potential revenue loss that could result from the closure of a particular station/branch. We assume that any transaction and/or revenue from the impacted office not lost will be absorbed by another office or through an alternate access channel.
- b. Yes. I am informed that certain postal costs associated with a consolidation are subtracted from certain cost savings expected to be realized as the result of a consolidation to produce a net cost savings figure.
- c. The Postal Service has developed no methodology for quantifying how much, if any, business will be lost per site or in the aggregate. It is assumed that any business not lost will migrate to other postal retail facilities or to alternate access.