

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001
RETAIL ACCESS OPTIMIZATION INITIATIVE, 2011 DOCKET NO. N2011-1

INTERROGATORIES OF DAVID B. POPKIN TO THE UNITED STATES POSTAL
SERVICE [DBP/USPS-1 through 15]

David B. Popkin hereby requests the United States Postal Service to answer, fully and completely, the following interrogatories pursuant to the Commission's Rules of Practice and Procedure. Any reference to testimony or other sources should indicate the page and line numbers. The instructions contained in the interrogatories DFC/USPS-T1-1-6 in Docket MC2006-7 dated February 23, 2007, are incorporated herein by reference. I am available for informal discussion to respond to your request to "clarify questions and to identify portions of discovery requests considered overbroad or burdensome."

July 28, 2011

Respectfully submitted,

N20111A1

DAVID B. POPKIN, POST OFFICE BOX 528, ENGLEWOOD, NJ 07631-0528

DBP/USPS-1 Please provide a listing of the scenarios under which a customer who receives mail delivery at a facility that is discontinued or consolidated will be able to continue to use their existing address.

DBP/USPS-2 Please provide a listing of the scenarios under which a customer who receives mail delivery at a facility that is discontinued or consolidated will not be able to continue to use their existing address.

DBP/USPS-3 [a] Will the Postal Service take into account the effect on customers who will be required to change their address as a result of the discontinuance or consolidation of a facility?

[b] If not, why not?

DBP/USPS-4 Please provide a listing of the actions it believes will be necessary on the part of a customer who is unable to maintain their existing address as a result of the discontinuance or consolidation of a facility.

DBP/USPS-5 Please confirm, or explain if you are unable to confirm, that the listing provided in the Library Reference consists of independent post offices and classified stations/branches.

DBP/USPS-6 The Postal Service utilizes the term “alternate access site” in determining those facilities to be studied for discontinuance of a facility. An “Approved Shipper” is included in that definition.

[a] Please provide a listing of those postal services that are available at an independent post office or classified station/branch that are not available at an Approved Shipper.

[b] Please provide a listing of those postal services that are available at an Approved Shipper that are not available at an independent post office or classified station/branch.

DBP/USPS-7 The Postal Service utilizes the term “alternate access site” in determining those facilities to be studied for discontinuance of a facility. A “Stamp Consignment Location” is included in that definition.

[a] Please provide a listing of those postal services that are available at an independent post office or classified station/branch that are not available at a stamp consignment location.

[b] Please provide a listing of those postal services that are available at a stamp consignment location that are not available at an independent post office or classified station/branch.

DBP/USPS-8 The Postal Service utilizes the term “alternate access site” in determining those facilities to be studied for discontinuance of a facility. A “Contract Postal Unit” is included in that definition.

[a] Please provide a listing of those postal services that are available at an independent post office or classified station/branch that are not available at a Contract Postal Unit

[b] Please provide a listing of those postal services that are available at a Contract Postal Unit that are not available at an independent post office or classified station/branch.

DBP/USPS-9 Please confirm, or explain if you are unable to confirm, that the criteria of being within a certain distance of at least five alternate access sites will be satisfied regardless of the type of alternate access site involved.

DBP/USPS-10 [a] Please advise how the two mile and half mile distances for alternate access sites were determined including whether criteria such as major highways, bodies of water, bridges or tunnels, etc. are considered.

[b] Please confirm that the distance is the distance between the facility being considered and the location of the alternate access site.

DBP/USPS-11 [a] Please advise the rationale for establishing a criteria for the second category that the FY 2010 revenue is less than the average of the FY 2008 and FY 2009 revenues.

[b] Please advise the rationale for including this requirement in the second category only.

[c] Please advise the percentage of facilities in the entire country that have a FY 2010 revenue that is less than the average of the FY 2008 and FY 2009 revenues.

[d] What is the total revenue for the Postal Service for FY 2008, FY 2009, and FY 2010?

DBP/USPS-12 [a] In a facility that has multiple units, is the revenue amount to meet the criteria [\$10,000 / \$27,500 / \$600,000 / \$1,000,000] for inclusion on the list of facilities for each individual unit or is it for all units in a ZIP Code or Post Office combined?

[b] Please explain the rationale for the response to subpart [a].

DBP/USPS-13 [a] Please advise what items are included in the revenue amount used to meet the criteria [\$10,000 / \$27,500 / \$600,000 / \$1,000,000] for evaluating a specific facility.

[b] Please advise what revenue items are not included.

[c] Please advise the rationale for not including the items in response to subpart [b] in the revenue amount used in the study.

DBP/USPS-14 Please explain the rationale for choosing each of the criteria [the dollar amounts of revenue, the distances to and number of the alternate access sites, etc.] for inclusion on the list of facilities to be studied.

DBP/USPS-15 Please advise the procedure that was followed with respect to the scenario of overlapping alternate access sites. For example in evaluating location A, assume that there are only five alternate access sites within the specified distance of location A and one of these sites is location B and evaluation of location B meets the criteria for inclusion on the list. If location B should then be discontinued or consolidated, there would only be four alternate access sites for location A.