

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-16 through 18]

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,

N20111B16

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

DBP/USPS-16 The Postal Service has utilized the Alternate Access Site criteria in evaluating whether a given facility should be studied for discontinuance or consolidation.

[a] Given that Saturday has a lesser retail service than a weekday, has this been taken into account in determining whether alternate access sites are available on Saturday.

[b] If not, why not?

[c] If so, please explain.

[d] Please provide a tabulation showing the percentage of postal facilities that have retail window service on Saturday broken down by District, Area, and nationwide.

DBP/USPS-17 If a facility that is being studied for discontinuance or consolidation is determined to justify the discontinuance or consolidation, is it an all or nothing

requirement or will it be possible to terminate only some of the functions [such as retail window service, post office box service, carrier operation, etc.] at the facility?

DBP/USPS-18 Please provide the claimed financial savings, both one time and annual, that will result by the discontinuance or consolidation of each of the facilities.