

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Retail Access Optimization Initiative

Docket No. N2011-1

PUBLIC REPRESENTATIVE
FIRST INTERROGATORIES AND REQUESTS FOR PRODUCTION OF
DOCUMENTS TO UNITED STATES POSTAL SERVICE WITNESS BOLDT
(PR/USPS-T1-1-5)

(August 1, 2011)

Pursuant to Rules 25 through 28 of the Postal Regulatory Commission Rules of Practice, the Public Representative hereby submits the following interrogatories and requests for production of documents.

DEFINITIONS AND INSTRUCTIONS

1. Each of the following discovery requests is continuing in nature and the Public Representative requests that if you obtain any additional responsive information or documents at any later date, you promptly so inform the Public Representative and submit supplemental or amended answers and documents.
2. If privilege is claimed with respect to any data, information, or documents requested herein, the party to whom the discovery request is directed should provide a privilege log (see, e.g., Docket No. C99-1, P.O. Ruling C99-1/9 at 4). Specifically, “the party shall make the claim expressly and shall describe the nature of the documents, communications, or things not produced or disclosed in a manner that, without revealing information itself privileged or protected, will enable other parties to assess the applicability of the privilege or protection.” Fed. R. Civ. P. 26(b)(5).
3. If in response to any discovery request the Postal Service is unable to provide any of the requested documents or information, please state, with particularity, the reasons why the requested information cannot be provided.
4. In responding to any questions contained in the attached discovery requests that require any calculations, analysis, assumptions, or studies that have been prepared, please provide and identify copies of such calculations, analysis, assumptions, studies,

and all workpapers relating thereto.

5. If an objection is made to only a part of a discovery request, please answer the remainder of the discovery request.

6. If data or information is not available in the exact format or level of detail requested, please provide such data or information (1) in a substantially similar format or level of detail or (2) in a format susceptible to being converted to the requested format and level of detail.

7. The term "Postal Service" includes all agents, employees, officers, directors, attorneys, representatives, and anyone acting on its behalf, as well as the Board of Governors, contractors, subcontractors to the Postal Service, and the Postal Service Office of Inspector General.

8. The terms "document" or "documents" are synonymous in meaning and equal in scope to the usage of the terms as defined by 16 CFR 3.34(b), including but not limited to the original or a copy of any letter, email, note, spreadsheet, memorandum, directive, report, study, meeting minutes, contract, diary entry or schedule, presentation, print out, speech, testimony, pamphlet, chart, tabulation, workpaper, draft, recording, and other writing or retrievable data or whatever kind or nature to which the Postal Service has or has had access to, regardless of origin or location, hardcopy or electronic, handwritten or typed. Documents should be produced in the way they are maintained.

9. The term "describe" means to detail in full, with specificity, the event or situation at issue.

10. The term "identify," (1) when used with regard to a person, means to provide the full name and position of the person, and (2) when used with regard to a document means to describe the subject matter of the document, its author, the date, and any intended recipients.

11. The term "communication(s)" means the transmittal of information by any means and includes communications or any kind, whether written, oral, electronic, or other.

12. All "documents," as defined above, responsive to discovery requests that can be located, discovered or obtained by reasonably diligent efforts, including without limitation all documents possessed by (a) you or your counsel or (b) any other person or entity from whom you can obtain such documents by request or which you have a legal

right to bring within your possession by demand, should be produced.

13. Responses to requests for explanations or the derivation of numbers should be accompanied by workpapers.

14. The term “workpapers” includes all backup material whether prepared manually, mechanically or electronically. Such workpapers should, if necessary, be prepared as part of the witness’s responses and should allow a third party to understand how the witness took data from a primary source and developed that data to achieve a final result. If Excel-type spreadsheets are used, please provide a version of the worksheets that include the underlying formulas for each cell.

15. Unless otherwise noted, all postal related terms have the definitions of the current version of the Postal Service’s Publication 32 – Glossary of Postal Terms.

Respectfully Submitted,
/s/ Tracy N. Ferguson
Tracy N. Ferguson
Public Representative for
Docket No. N2011-1

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On page 13 of your testimony, you state: "It should be emphasized that postal management is not pursuing the RAO Initiative in order to achieve any predetermined operating cost savings target in the postal retail network."

- a. Does the Postal Service expect to achieve cost savings if the RAO Initiative is implemented?
- b. Please confirm that your testimony does not include an estimate of cost savings from implementing the RAO Initiative.
- c. Please provide an estimate of the cost savings from implementing the RAO initiative.
- d. Does the Postal Service currently maintain a database of all retail facilities? If so, please provide this database in either excel format or as a flat file for FY2008, FY2009 and FY2010. Please identify and define all data fields.
- e. Does the Postal Service currently maintain a database of all retail facilities with cost and revenue for each facility? If so, please provide this database in either excel format or as a flat file for FY2008, FY2009 and FY2010. Please identify and define all data fields.

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On page 15 of your testimony, you state: "the Postal Service has examined earned workload data for each of its retail facilities and has identified all Post Offices for which earned workload amounted to less than two hours per day and annual revenue was no greater than \$27,500. Over 2,800 candidate offices were identified using data collected from the Small Office Variance tool."

- a. How does the Postal Service determine the workload and EAS classification of each Postal Facility?
- b. Please provide the "Small Office Variance Tool" in either excel format or as a flat file for FY 2009 and FY2010. Please identify and define all data fields

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On page 11 of your testimony, you state that "retail locations with annual walk-in revenue of less than the relatively low figure of \$100,000 generally tend not to be as geographically isolated as some might assume. Table 5 below is based on data for 13,494 retail locations for which latitude and longitude data were available."

- a. How many postal retail locations averaged less than \$100,000 in yearly walk in revenue in FY 2008, FY2009, and FY2010.

- b. The file “nearest neighbor graph data.xls” tab “data” contains location title data for a confidential number of postal retail locations. Was the Postal Service unable to obtain latitude and longitude data for all postal retail locations? If not, please explain why some postal locations were excluded from the “nearest neighbor” calculation.
- c. Please discuss how exclusion of postal retail locations from the nearest neighbor calculation will impact the retail access optimization process.

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The file “FY2010 Offices under \$100,000 by Technology.xls” contains location and revenue data for postal retail locations using different reporting technologies.

- a. Please confirm that the Postal Service has determined the accuracy and quality of this database. If confirmed, please provide any analysis corroborating the data quality.
- b. Please confirm that the file “FY2010 Offices under \$100,000 by Technology.xls” contains postal retail facilities that report negative revenue? If confirmed, please explain why a postal retail facility would have negative yearly revenue.
- c. Please discuss the different reporting technologies used to estimate walk in revenue for postal retail facility. Please describe the impact on data accuracy associated with each of the different reporting technologies.

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USPS-T-1 states that “approximately 85 percent of postal retail revenue is generated from the sale of postage.” At 7-8. The source is listed as “sample of 748 retail locations” at 8. Please provide a version of USPS-LR-NP2 file “Revenue Distribution for LT100K Locations.xls” that links the results displayed on page 8 of USPS-T-1 with the source data.