

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Retail Access Optimization Initiative

Docket No. N2011-1

PUBLIC REPRESENTATIVE
SECOND INTERROGATORIES AND REQUESTS FOR PRODUCTION OF
DOCUMENTS TO UNITED STATES POSTAL SERVICE WITNESS BOLDT
(PR/USPS-T1-6-9)

(August 4, 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 included with the Public Representative's interrogatories PR/USPS- T1- 1-5, dated August 1, 2011, are hereby incorporated by reference.

Respectfully Submitted,

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

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In your testimony, at pages 10-13, you discuss the proximity of postal retail facilities to other postal retail facilities. The library reference you sponsor, USPS-LR-NP1, contains files (under seal) that provide the geographic location and distance between many postal retail locations. The following questions concern the file “Nearest Neighbor graph data.xls,” and the importance of geographic proximity to the RAO initiative.

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The postal retail facility “Red Devil AK” is under consideration for closure according to cell A6 in tab “new_2hrs” in USPS-LR-2, as is “Crooked Creek AK” (cell A5), and “Sleetmute AK” (cell A14). According to the Post Office locator at http://usps.whitepages.com/post_office/AK/99656?d=40, the closest postal retail facilities to the Red Devil AK location are as follows:

City	State	ZIP	Distance
Red Devil	AK	99656	0.0 mi
Sleetmute	AK	99668	12.7 mi
Crooked Creek	AK	99575	31.6 mi
Chuathbaluk	AK	99557	37.8 mi

- a. Please confirm that in cell I13442 of tab “data” in file “Nearest Neighbor graph data.xls,” the nearest neighbor to the Red Devil AK postal retail location is neither recorded as 12.7 miles, nor 31.6 miles, nor 37.8 miles.
- b. Please explain why the data for this location in USPS-LR-NP1 does not match the information available on the USPS Post Office locator.
- c. In general, does the “Nearest Neighbor” pool include postal retail facilities that, in addition to the target facility, may be closed as a result of the RAO initiative within 365 days of the determination to close the target facility?
- d. How are “Nearest Neighbors” identified and their distance from each other calculated when there are multiple (i.e., more than two) concurrent postal retail facility closures within a particular geographic area?
- e. Please explain the steps the Postal Service will pursue to ensure that accurate information is available regarding the distance to alternative access points in event of closure.

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The postal retail facility “Goodsprings AL” is under consideration for closure according to cell A26 in tab “new_2hrs” in USPS-LR-2. According to the Post Office locator at http://usps.whitepages.com/post_office/35560, the closest postal retail facility is the Parrish AL location, which is 5.5 miles away.

- a. Please confirm that in cell I1636 of tab “data” in file “Nearest Neighbor graph data.xls,” the nearest neighbor to the “Goodsprings AL” postal retail locations is not recorded as 5.5 miles away.
- b. Please explain why the data for this location in USPS-LR-NP1 does not match the information available on the USPS Post Office locator.
- c. According to Google Maps, the driving distance from the Goodsprings AL location to the Parrish AL location is 7.6 miles, (http://maps.google.com/maps?saddr=824+Goodsprings+Road,+Parrish,+AL&daddr=5911+Highway+269,+Parrish,+AL+35580&hl=en&ll=33.694352,-87.261658&spn=0.212236,0.140762&sll=37.0625,-95.677068&sspn=51.222969,31.289063&geocode=FbuUAQId9B3N-imNkHZqS_OliDGuiiDCy8lxhg%3BFXzwAglDz1nM-inlfxUIZoqliDHSSKzOd99jwA&mra=ls&t=h&z=12) please discuss the steps the Postal Service will pursue to ensure that accurate information is available regarding the actual travel distance to alternative access points in event of closures.

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Please discuss how the database used to calculate USPS-LR-NP2 and table 5 on page 12 your testimony differs from the database used to calculate the distance between postal facilities at <http://usps.whitepages.com>.

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Please provide the database used to calculate the distance between postal facilities at <http://usps.whitepages.com>.