

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, DC 20268-0001

Retail Access Optimization Initiative

Docket No. N2011-1

PUBLIC REPRESENTATIVE  
THIRD INTERROGATORIES AND REQUESTS FOR PRODUCTION OF  
DOCUMENTS TO UNITED STATES POSTAL SERVICE WITNESS BOLDT  
(PR/USPS-T1-10 -13)

(August 5, 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 7-9, and in you discuss retail revenue for postal retail facilities in total, and for offices with less than \$100,000 in “walk-in revenue”. The library reference you sponsor, USPS-LR-NP2, contains flies (under seal) that provide analysis of walk in revenue for postal retail locations. The following questions concern the how retail revenue is calculated.

**PR/USPS-T1- 10**

On page 7 of your testimony, Table 2 presents retail revenue for different sources of access. Please provide the data used to develop this table.

**PR/USPS-T1-11**

Please confirm that the calculation of walk-in revenue in USPS-LR-NP2 does not include revenue from any First Class Presort Mail, Standard Mail, or Periodicals Mail.

**PR/USPS-T1-12**

Can First Class Presort Mail, Standard Mail, or Periodicals Mail be entered and paid for at any of the postal retail facilities listed in USPS-LR-NP2 file “Basket Analysis by UFN.xls” or “USPS-LR-N2011-1\_NP2 Revenue Distribution for LT100K Locations - Pie Chart.xls”? If so, please explain why this revenue has not been included.

**PR/USPS-T1-13**

Please provide a version of USPS-LR-1 that, for each postal retail facility under consideration for discontinuance, identifies:

- a. If the facility is co-located with a BMEU
- b. If the facility is co -located with a city carrier delivery unit
- c. If the facility is co -located with a rural carrier delivery unit
- d. If the facility is co -located with a mail processing facility
- e. If the facility currently provides any mailers with exceptional dispatch service
- f. How many Post Office boxes are currently:
  1. Located at the facility
  2. Rented at the facility