

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

STATION AND BRANCH OPTIMIZATION AND
CONSOLIDATION INITIATIVE, 2009

Docket No. N2009-1

**DIRECT TESTIMONY OF
ALICE M. VANGORDER
ON BEHALF OF
UNITED STATES POSTAL SERVICE**

USPS-T-1

Table of Contents

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17

	<u>PAGE</u>
Autobiographical Sketch	1
I. Purpose and Scope of Testimony	3
II. Overview of Current Station and Branch Network.....	4
III. Time to Re-evaluate the Retail Network	5
IV. Station and Branch Optimization and Consolidation Initiative ..	10
V. Potential Changes In the Nature of Postal Services.....	12
VI. Conclusion	13
Attachment A	

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

Autobiographical Sketch

My name is Alice M. VanGorder. I am currently the Acting Manager, Customer Service Operations within the Delivery and Post Office Operations Group in USPS Headquarters. I have served in this capacity since May 2009. My office has the primary responsibility for developing policies and procedures related to managing the day-to-day operations in Post Offices, setting policies, opening and closing facilities, and improving customer experiences when doing business with the Postal Service. Previously, I was appointed in April 2007 to serve as Manager, Address Management, in Memphis, Tennessee where I had primary responsibility for the administration of the Postal Service Address Management system (AMS), the Change-of-Address databases, as well as related change-of-address programs.

I joined the Postal Service in May, 1979 as a Computerized Mark-up Clerk in Boston, Massachusetts. I worked various clerk positions in mail processing operations and was promoted into the management ranks in Boston as Supervisor, with responsibilities in Automation, the Computerized Forwarding Systems, and Automation Readability.

In 1990, I was promoted to Automation Implementation Coordinator for the Northeast Region in Windsor, Connecticut. A year later, I was appointed to Automation Advisor. In both of these positions, I participated in the implementation and integration of the Postal Service automation program.

Beginning in 1992, I served in a variety of positions at USPS Headquarters. In the office of Operational Requirements, I was responsible for

1 developing enhancements to mail preparation requirements in support of
2 automation implementation. I also held positions in both Processing Operations
3 and Marketing.

4 In 1998, I accepted a position as Customer Service Support Analyst in
5 Address Management, in Memphis, TN, where I oversaw programs focused on
6 improving address quality.

7 In July 2002, I accepted the Headquarters position of Manager, Market
8 Integration. In 2006, I was appointed as Manager, Business Service Network
9 (BSN), where I had national responsibility for establishing customer service
10 policy and programs, and development and implementation of strategies to
11 improve customer service for national and premier account customers.

12 I have a Bachelor of Arts Degree in Liberal Studies and a Masters Degree
13 in Public Administration, both from American University in Washington, DC.

14 In Postal Regulatory Commission Docket No. MC2008-1, I provided a
15 Statement on behalf of the United States Postal Service.

16

17

1 I. Purpose and Scope of Testimony

2 The purpose of my testimony is to explain how the United States Postal
3 Service implementation of its Station and Branch Optimization and Consolidation
4 Initiative (“Initiative”) serves various agency policy goals, including an explanation
5 of how the initial focus on stations and branches that report to EAS-24 (and
6 above) Postmasters satisfies those goals while continuing to provide ready
7 access to retail service for customers.

8

1 II. Overview of Current Station and Branch Network

2

3 The United States Postal Service operates an extensive retail network that
4 encompasses more than 36,700 facilities located throughout the domestic
5 service area of the United States. These facilities consist primarily of over
6 27,200 Post Offices and more than 4,800 stations and branches.

7 A Post Office is the basic organizational unit of the United States Postal
8 Service, having primary responsibility for collection, mail processing,¹ delivery,
9 and retail operations in a specific geographic area. Operations at the
10 approximately 4,800 stations and branches are directed by the Postmaster at
11 each office's supervising Post Office, with the result that the mix of services
12 offered at respective stations and branches varies over time. A postal station is a
13 subordinate unit of a Post Office located within the same corporate limits as the
14 Post Office. A postal branch is the same as a station except that it is located
15 outside the corporate limits of the city or town hosting the Post Office.²

16 Historically, in response to growth either experienced or projected in retail
17 window transactions, delivery volume or delivery points, the Postal Service has
18 expanded its retail and delivery networks. With the exception of the deposit of
19 mail into a collection box or other receptacle, most retail postal transactions

¹ Most mail processing is conducted within the Postal Service network of approximately 400 plants. Post Office mail processing operations include collection of outgoing mail from delivery receptacles and collection boxes, and perhaps also a bulk mail entry unit (BMEU), and the processing necessary to accept and distribute mail destinating in a Post Office's service area to carriers and Post Office Box section clerks.

² These important facility designations and administrative relationships often do not matter to members of the general public. In the common vernacular, virtually every postal facility offering retail services is referred to as a "post office" And the Postal Service does not do always clearly communicate these distinctions.

1 required a visit to a Post Office, station or branch.³ Cumulatively, the current
2 locations of postal stations and branches reflect various decisions made over
3 decades to create postal retail and delivery networks that fulfill the Postal
4 Service's obligation to provide customers with effective and ready access to
5 adequate and efficient service. Those decisions also were made at times when
6 alternative access channels to retail postal services were non-existent or
7 nascent.⁴

8

9 III. Time to Re-evaluate the Retail Network

10 Things have changed, and the pace of change continues to accelerate. In
11 the past decade, business and household mailers have increasingly turned to
12 emerging electronic media to transmit messages that were formerly sent through
13 the hard copy postal system. Such alternate access channels and changes in
14 customer mailing patterns require that the Postal Service reevaluate its retail
15 network to make sure that facilities are indeed of a type and in such locations
16 that customers have ready access to postal services consistent with reasonable
17 economies of postal operations.

18 The Postal Service has already responded to long-term mail volume and
19 revenue trends by (1) consolidating mail processing operations, (2) adjusting
20 carrier routes, (3) adjusting the proportion of space allotted to respective

³ A fourth option, contract postal units (CPUs) further supplements retail customer access to certain services and products. Private parties operate nearly 4000 CPUs today.

⁴ The most basic retail transaction, purchase of stamps (and still the single most common retail transaction), illustrates the growth of alternative access channels; today stamps can be purchased from one of thousands of consignees such as grocery stores, by mail or telephone, and via the internet.

1 requirements at many of its retail and delivery facilities, and (4) looking for
2 opportunities for consolidating carrier operations where improved processes,
3 equipment, and reduced workload at such facilities make this possible.
4 Additional opportunities for improved efficiency in the retail network must now be
5 explored.

6 The immediate focus of this Optimization Initiative is upon stations and
7 branches subordinate to EAS-24 and above Post Offices. Alternate access
8 channels are now widely available, especially to urban and suburban customers.
9 The Postal Service's public website and the availability of postage stamps at
10 non-postal retail locations make it possible for customers to perform many
11 common postal transactions and obtain useful postal information without visiting
12 a Postal Service retail facility or contract postal unit. The availability of these
13 alternative channels, combined with shifts in mail volume to electronic
14 alternatives, and the ongoing economic recession, all contribute to the current
15 diminished levels of retail activity in postal facilities compared to years past.

16 The public website of the Postal Service, www.usps.com, receives almost
17 30 million monthly customer visits. Using the website, postal customers can find
18 ZIP Codes, calculate postage, print shipping labels (with or without postage),
19 schedule carrier pickup, track packages and confirm delivery, locate Post Offices
20 and vacant Post Office boxes, order shipping supplies, purchase stamps and
21 philatelic items, file change-of-address or mail-forwarding notices, file requests
22 for a temporary hold on mail delivery, and request redelivery of missed packages
23 or other mail pieces.

1 While stamp purchases are still the most frequent retail lobby transaction,
2 the Postal Service has made it easier for customers to obtain stamps at other
3 locations where they frequently make purchases, thus avoiding a trip to a postal
4 retail unit. Postal customers currently can buy postage stamps – at Post Office
5 prices – in almost 50,000 supermarkets, convenience stores and other retail
6 businesses, more locations than there are Post Offices, stations, branches and
7 contract postal units combined. These consignment stamp sales generate more
8 than \$1 billion in annual postage revenue. In addition, the advent of the Forever
9 Stamp has made the price change experience easier for basic rate First-Class
10 Mail users (household and small business customers), further reducing the
11 number of postal retail window visits and transactions they must undertake.

12 There also are currently nearly 2,700 privately-operated Approved Shipper
13 locations run by mail and shipping preparation businesses throughout the nation.
14 These businesses accept parcels and other matter for entry into the mailstream,
15 or delivery by postal competitors.

16 In recent years, about 2,500 Automated Postal Centers (APCs), many with
17 “24/7” access, have been installed in postal retail lobbies to reduce the need for
18 retail postal window transactions. Postal customers also continue to have the
19 option of ordering stamps by mail. Customers who make a toll-free telephone
20 call to 1-800 ASK-USPS (275-8777) are able to obtain the same products and
21 services that are available at www.usps.com, including mailing and shipping
22 supplies and stamps. Many items that can be mailed at a postal retail window or
23 deposited in a postal collection box can be mailed by a customer right at their

1 home or office via Carrier Pickup Service. In FY 2008, there were over 5.3
2 million Carrier Pickup transactions, further reducing visits to postal retail
3 windows.

4 While there was a time when practically all retail postal revenue was
5 generated through window transactions at “brick and mortar” postal retail units;
6 more than a quarter of retail revenue is now generated through alternate access
7 channels and the proportion continues to increase. The Postal Service views the
8 increase in retail customer convenience resulting from the alternative access
9 channels as consistent with its obligation to establish postal facilities of such
10 character and in such locations that customers have ready access to essential
11 postal services. Moreover, alternate access channels and the increased
12 convenience they bring, are vital to the retention of mail volume in the long-run.
13 Although overall postal retail window transactions have declined, the Postal
14 Service regards that portion of the decline attributable to the convenience offered
15 by alternative postal retail access channels as an outstanding success.

16 The availability of alternative channels combined with shifts in mail volume
17 to electronic alternatives, and the ongoing economic recession obligate the
18 Postal Service to examine stations and branches in its extensive and heretofore
19 relatively untouched retail network. To that end, the Postal Service will begin by
20 reviewing stations and branches that report to Postmasters who are at or above
21 the EAS-24 level pay grade. Attachment A to my testimony is a list of 396 Post
22 Offices in whose service areas candidate stations and branches are located.⁵

⁵ The Postal Service is compiling a list that is expected to identify specific candidate station and branches and intends to file a copy with the Commission as soon as possible.

1 These stations and branches primarily serve urban and suburban
2 customers. In some instances, stations and branches are within a few minutes
3 walk of each other. The geographic concentration of postal retail facilities in
4 denser population centers means such customers are likely to have far more
5 options – nearby stations, branches, or CPUs, APCs, Approved Shippers, and
6 consignees, plus higher rates of internet use -- for accessing retail service than
7 are available to postal customers in more isolated small towns and rural areas.
8 The general decline in visits to postal stations and branches, especially with
9 respect to those in close proximity to one another, denotes opportunities within
10 population centers to reduce excess retail service capacity while maintaining
11 customers' ready access to essential postal services.⁶

12 In large measure, the current number and location of facilities comprising
13 the postal retail network were sized to accommodate peak levels of retail window
14 service that may no longer be needed; the availability of the many convenient
15 alternative retail access channels should mean that even less capacity will be
16 needed in the near future. Reevaluation is necessary. The Postal Service's
17 long-term viability depends upon its ability to provide ready access to essential
18 mailing services economically at facilities of such character and in such locations
19 – whether electronic, brick-and-mortar, or wholly postal – that meet the needs of
20 the public. Accordingly, the Postal Service is focusing initially on the opportunity

⁶ In addition, “front-of-the-house” retail window and lobby service is often provided at stations or branches co-located with “back-of-the-house” carrier delivery operations that consume the overwhelming bulk of the floor space in a leased facility. Where the consolidation of carrier operations occurs among stations and branches in the same Post Office service area (which is not a part of this Initiative), there may be opportunities to determine whether a proper balance of efficiency and service considerations (as a part of this Initiative) permits the relocation or consolidation of retail window and lobby service operations to higher-traffic locations with more customer parking available.

1 to improve efficiency through consolidation of retail operations at stations and
2 branches that report to EAS-24 and above Postmasters.⁷

3

4 IV. Station and Branch Optimization and Consolidation Initiative

5 The Postal Service has a longstanding process used by District offices to
6 initiate the examination of opportunities for consolidation of operations at stations
7 and branches, and to submit proposals to Headquarters for approval. This
8 process, described in the testimony of witness Kimberly I. Matalik (USPS-T-2), is
9 a critical component of the Station and Branch Optimization and Consolidation
10 Initiative. Stations and branches that report to EAS-24 and above Postmasters
11 represent a substantial portion of the annual total operating expenses (including
12 employee salaries and benefits, leasing costs and utilities) for the Postal Service.
13 Focusing initially on these stations and branches, the Postal Service will be
14 examining the feasibility of moving retail units and carrier operations into smaller
15 facilities, as well as the consolidation of both retail and delivery from one location
16 into other nearby retail and delivery units. The greatest opportunity to achieve
17 significant savings in retail operations while continuing to provide ready access to
18 adequate and efficient postal services is in locations identified in Attachment A.

⁷ At the same time, with mail volume and average delivery volume per address down as well, there may be opportunities to consolidate carrier operations presently located at these stations and branches into fewer locations, with no change in service. The only delivery-related operational change may be that carriers would leave from and return to a different station, branch or annex in order to serve their routes than may be the case today. Such delivery-related changes are outside the scope of the Station and Branch Optimization and Consolidation Initiative, but are mentioned here solely for the purpose of acknowledging that the closure of a station or branch can affect carrier delivery operations as well as retail window and lobby service.

1 The list of 396 cities in that Attachment illustrates how the potential impact
2 of the Initiative could be widespread throughout the postal system. However, it is
3 impossible to predict how many stations and branches ultimately will be
4 subjected to discontinuance, or how significant the overall impact may be on the
5 nature of any particular postal service or customer groups. In any event, no
6 service changes resulting from a decision to discontinue a station or branch as a
7 part of this Initiative will be implemented before October 2, 2009.

8 The Postal Service has not established any target for the number of
9 stations or branches that will be consolidated after the review process is applied
10 systemwide for purposes of this initiative. No facility will be consolidated unless
11 a study demonstrates an opportunity for efficiency gains while maintaining ready
12 access to adequate service. While witness Matalik (USPS-T-2) describes the
13 baseline pace at which all stations and branches have been consolidated over
14 the past few years, the big picture implies that many more consolidation
15 opportunities can be found; the Initiative accordingly starts out by nominating a
16 specific set of facilities to which field managers' attention is directed.

17 No overall cost savings targets or goals have been established, nor should
18 they be. Over the years, Postal Service management has learned that local
19 conditions do require local oversight and examination. Accordingly, the decision-
20 making process relies on the development of information by District offices
21 before Headquarters determines whether a particular consolidation proposal will
22 maintain ready access to adequate and efficient service. General trends in
23 postal retail transactions and increased reliance on alternate channels of access

1 to postal retail services imply the existence of opportunities; so the objective of
2 the Initiative is to concentrate field management's application of a venerable
3 analytical process for studying components of the retail network to determine if it
4 can more efficiently serve the needs of the mailing public. The expectation is
5 that the resultant retail network will continue to provide ready access to adequate
6 service and that efficiency gains will have the effect of mitigating the constant
7 pressure to raise postal prices paid by all customers.

8

9 V. Potential Changes In the Nature of Postal Services

10 Because the number of stations or branches that may be consolidated is
11 unknown, yet the possibility exists that the number may be substantial once the
12 review process has run its course, it is unclear to what degree the quantitative or
13 qualitative nature of any specific postal service may change, or whether any
14 change in the nature of a postal service will rise to the level of being substantially
15 nationwide in scope.

16 One change in the nature of postal services that customers may
17 experience pertains to Post Office Box service. The Postal Service expects that
18 no existing box customers would be disenfranchised, some may experience
19 address changes in box number or ZIP Code. If a station or branch is
20 consolidated with a neighboring unit, there may be instances where the Postal
21 Service will decide to relocate the Post Office Box section from a consolidated
22 facility to a gaining office. Depending on the size of the gaining facility, the ZIP
23 Code of the consolidated facility, and the physical box section of the gaining

1 office, some changes to Post Office Box addresses may prove necessary. In
2 such instances, the solution may be to relocate to a cluster box unit or to a
3 leased non-personnel Post Office Box unit (with or without an Automated Postal
4 Center). However, every reasonable effort will be explored in order to minimize
5 such changes.

6 The Station and Branch Optimization and Consolidation Initiative is
7 expected to lead to the discontinuance of retail postal services at some locations.
8 In such cases, customers will be directed to neighboring postal retail units (Post
9 Offices, stations or branches), or contract postal units; all customers will also be
10 encouraged to avail themselves of the variety of alternative retail access
11 channels discussed above.

12 With respect to ZIP Codes, Postal Service policy is that the ZIP Code of a
13 discontinued facility is retained absent some operational reason justifying a
14 change. Those changes are approved through the respective Vice Presidents,
15 Area Operations. Delivery route customers should experience no appreciable
16 change in the way they currently receive their mail; however, any accountable
17 mail that they receive that was formerly picked up at a then-consolidated facility
18 would need to be picked up at the gaining office (assuming the customer does
19 not request re-delivery on another day or authorize delivery to another party).

20

21 VI. Conclusion

22 In response to long-term mail volume and revenue trends, the Postal
23 Service is engaged in different mail processing and delivery operations changes

1 designed to maintain service in a more efficient manner. Additional opportunities
2 for improved efficiency in the retail network must now be explored. The Station
3 and Branch Optimization and Consolidation Initiative accordingly follows upon
4 other necessary adjustments as the Postal Service accommodates itself to a
5 changed era.
6

CITIES WITH STATIONS/ BRANCHES UNDER CONSIDERATION			
STATE	Area	District Name	CITY
AK	WESTERN	ALASKA DISTRICT	ANCHORAGE AK
AL	SOUTHEAST	ALABAMA DISTRICT	HUNTSVILLE AL
			MOBILE AL
			MONTGOMERY AL
			TUSCALOOSA AL
AR	SOUTHWEST	ARKANSAS DISTRICT	FAYETTEVILLE AR
			FORT SMITH AR
			LITTLE ROCK AR
			NORTH LITTLE ROCK AR
AZ	WESTERN	ARIZONA DISTRICT	CHANDLER AZ
			FLAGSTAFF AZ
			GILBERT AZ
			MESA AZ
			SCOTTSDALE AZ
			SUN CITY AZ
			TEMPE AZ
CA	PACIFIC	BAY-VALLEY DISTRICT	BERKELEY CA
			CONCORD CA
			FREMONT CA
			HAYWARD CA
			OAKLAND CA
			RICHMOND CA
			SALINAS CA
			SAN JOSE CA
			SANTA CLARA CA
			SANTA CRUZ CA
		VALLEJO CA	
		LOS ANGELES DISTRICT	BEVERLY HILLS CA
			INGLEWOOD CA
			LOS ANGELES CA
			REDONDO BEACH CA
			SANTA MONICA CA
		SACRAMENTO DISTRICT	FRESNO CA
			MODESTO CA
			REDDING CA
			SACRAMENTO CA
			STOCKTON CA
		SAN DIEGO DISTRICT	CHULA VISTA CA
			EL CAJON CA
			ESCONDIDO CA
			FONTANA CA
			MORENO VALLEY CA

CITIES WITH STATIONS/ BRANCHES UNDER CONSIDERATION			
STATE	Area	District Name	CITY
			OCEANSIDE CA
			RIVERSIDE CA
			SAN DIEGO CA
			SAN BERNARDINO CA2
		SAN FRANCISCO DISTRICT	PALO ALTO CA
			SAN FRANCISCO CA
			SAN MATEO CA
			SANTA ROSA CA
			SUNNYVALE CA
		SANTA ANA DISTRICT	ANAHEIM CA
			CORONA CA
			FULLERTON CA
			GARDEN GROVE CA
			HUNTINGTON BEACH CA
			IRVINE CA
			LA PUENTE CA
			LAGUNA BEACH CA
			NEWPORT BEACH CA
			ONTARIO CA
			ORANGE CA
			POMONA CA
			RANCHO CUCAMONGA CA
			SANTA ANA CA
			TORRANCE CA
			WHITTIER CA
			SAN JUAN CAPISTRANO CA
		SIERRA COASTAL DISTRICT	BAKERSFIELD CA
			GLENDALE PO CA
			LANCASTER CA
			NORTH HOLLYWOOD CA
			OXNARD CA
			PASADENA CA
			SAN FERNANDO CA
			SANTA BARBARA CA
			SANTA CLARITA CA
			THOUSAND OAKS CA
			VAN NUYS CA

CITIES WITH STATIONS/ BRANCHES UNDER CONSIDERATION			
STATE	Area	District Name	CITY
CO	WESTERN	COLORADO/WYOMING DISTRICT	AURORA CO
			BOULDER CO
			COLORADO SPRINGS CO
			DENVER CO
			FORT COLLINS CO
			LITTLETON CO
			PUEBLO CO
			GRAND JUNCTION CO
STATE	Area	District Name	CITY
CT	NORTHEAST	CONNECTICUT DISTRICT	BRIDGEPORT CT
			HARTFORD CT
			NEW HAVEN CT
			STAMFORD CT
			WATERBURY CT
DC	CAPITAL METRO	CAPITAL DISTRICT	Washington DC
DE	EASTERN	SOUTH JERSEY DISTRICT	WILMINGTON, DE
			NEWARK, DE
FL	SOUTHEAST	CENTRAL FLORIDA DISTRICT	BOCA RATON FL
			BOYNTON BEACH FL
			DELRAY BEACH FL
			FT PIERCE FL
			KISSIMMEE FL
			LAKE WORTH FL
			MELBOURNE FL
			PORT SAINT LUCIE FL
			VERO BEACH FL
			NORTH FLORIDA DISTRICT
		GAINESVILLE FL	
		JACKSONVILLE FL	
		OCALA FL	
		PANAMA CITY FL	
		PENSACOLA FL	
		TALLAHASSEE FL	
		SOUTH FLORIDA DISTRICT	FORT LAUDERDALE FL
			HIALEAH FL
			HOLLYWOOD FL
			MIAMI BEACH FL
			MIAMI FL
			POMPANO BEACH FL

CITIES WITH STATIONS/ BRANCHES UNDER CONSIDERATION			
STATE	Area	District Name	CITY
		SUNCOAST DISTRICT	BRADENTON FL
			BROOKSVILLE FL
			CLEARWATER FL
			FORT MYERS FL
			LAKELAND FL
			LARGO FL
			NAPLES FL
			PLANT CITY FL
			PUNTA GORDA FL
			SAINT PETERSBURG FL
			SARASOTA FL
			TAMPA FL
			VENICE FL
GA	SOUTHEAST	ATLANTA DISTRICT	ATHENS GA
			ATLANTA GA
			DECATUR GA
			LAWRENCEVILLE GA
			MARIETTA GA
		SOUTH GEORGIA DISTRICT	ALBANY GA
			AUGUSTA GA
			COLUMBUS GA
			MACON GA
			SAVANNAH GA
HI	PACIFIC	HONOLULU DISTRICT	HONOLULU HI
IA	WESTERN	HAWKEYE DISTRICT	CEDAR RAPIDS IA
			DES MOINES IA
			SIOUX CITY IA
			WATERLOO IA
ID	WESTERN	SPOKANE DISTRICT	BOISE ID
IL	GREAT LAKES	CENTRAL ILLINOIS DISTRICT	JOLIET IL
			NAPERVILLE IL
			OAK BROOK IL
			OAKLAWN IL
			PEORIA IL
			SPRINGFIELD IL
			AURORA IL
		Chicago DISTRICT	CHICAGO IL
		GATEWAY DISTRICT	QUINCY IL
		NORTHERN ILLINOIS DISTRICT	ARLINGTON HEIGHTS IL
			ROCKFORD IL

CITIES WITH STATIONS/ BRANCHES UNDER CONSIDERATION			
STATE	Area	District Name	CITY
IN	EASTERN	KENTUCKIANA DISTRICT	SCHAUMBURG IL
		KENTUCKIANA DISTRICT	EVANSVILLE IN
	GREAT LAKES	GREATER INDIANA DISTRICT	FORT WAYNE IN
			GARY IN
			INDIANAPOLIS IN
			LAFAYETTE IN
KS	WESTERN	CENTRAL PLAINS DISTRICT	TOPEKA KS
			WICHITA KS
		MID-AMERICA DISTRICT	KANSAS CITY KS
			SHAWNEE MISSION KS
KY	EASTERN	CINCINNATI DISTRICT	COVINGTON KY
		KENTUCKIANA DISTRICT	LEXINGTON, KY
			LOUISVILLE KY
LA	SOUTHWEST	LOUISIANA DISTRICT	ALEXANDRIA LA
			BATON ROUGE LA
			LAFAYETTE LA
			LAKE CHARLES LA
			METAIRIE LA
			NEW ORLEANS LA
			SHREVEPORT LA
MA	NORTHEAST	BOSTON DISTRICT	BOSTON MA
			CAMBRIDGE MA2
		MASSACHUSETTS DISTRICT	LAWRENCE MA
			LYNN MA
			SPRINGFIELD MA
		SOUTHEAST NEW ENGLAND DISTRICT	WORCESTER MA
			NEW BEDFORD MA
MD	CAPITAL METRO	BALTIMORE DISTRICT	Baltimore MD
			EASTON, MD
			Glen Burnie MD
		CAPITAL DISTRICT	BETHESDA MD
			GAITHERSBURG MD
			HYATTSVILLE, MD
			ROCKVILLE, MD
			SILVER SPRING, MD
ME	NORTHEAST	MAINE DISTRICT	PORTLAND ME

CITIES WITH STATIONS/ BRANCHES UNDER CONSIDERATION			
STATE	Area	District Name	CITY
MI	GREAT LAKES	DETROIT DISTRICT	ANN ARBOR MI
			DEARBORN MI
			DETROIT MI
			JACKSON MI
			WAYNE MI
		GREATER MICHIGAN DISTRICT	GRAND RAPIDS MI
			KALAMAZOO MI
			LANSING MI
			MUSKEGON MI
			SAGINAW MI
		SOUTHEAST MICHIGAN DISTRICT	FLINT MI
			MOUNT CLEMENS MI
			PONTIAC MI
			ROYAL OAK MI
			SOUTHFIELD MI
UTICA MI			
WARREN MI			
MN	WESTERN	NORTHLAND DISTRICT	DULUTH MN
			HOPKINS MN
			MANKATO MN
			MINNEAPOLIS MN
			ROCHESTER MN
			SAINT CLOUD MN
			SAINT PAUL MN
MO	GREAT LAKES	GATEWAY DISTRICT	COLUMBIA MO
			SAINT CHARLES MO
			ST LOUIS MO
	WESTERN	MID-AMERICA DISTRICT	CAPE GIRARDEAU MO
			INDEPENDENCE MO
			KANSAS CITY MO
MS	SOUTHEAST	MISSISSIPPI DISTRICT	GREENVILLE MS
			JACKSON MS
			MERIDIAN MS
			NATCHEZ MS
MT	WESTERN	BIG SKY DISTRICT	BILLINGS MT
			GREAT FALLS MT
			MISSOULA MT

CITIES WITH STATIONS/ BRANCHES UNDER CONSIDERATION			
STATE	Area	District Name	CITY
NC	CAPITAL METRO	GREENSBORO DISTRICT	DURHAM NC
			RALEIGH NC
			WINSTON-SALEM NC
			GREENSBORO NC
		MID-CAROLINAS DISTRICT	ASHEVILLE NC
			CHARLOTTE NC
			FAYETTEVILLE NC
			WILMINGTON, NC
ND	WESTERN	DAKOTAS DISTRICT	FARGO ND
NE	WESTERN	CENTRAL PLAINS DISTRICT	LINCOLN NE
			OMAHA NE
NH	NORTHEAST	NEW HAMPSHIRE/VERMONT DISTRICT	MANCHESTER NH
NJ	EASTERN	SOUTH JERSEY DISTRICT	CAMDEN NJ
		NEW YORK METRO	CENTRAL NEW JERSEY DISTRICT
	TRENTON NJ		
	NORTHERN NEW JERSEY DISTRICT		ELIZABETH CITY NJ
			NEWARK NJ
	PATERSON NJ		
JERSEY CITY NJ			
NM	SOUTHWEST	ALBUQUERQUE DISTRICT	ALBUQUERQUE NM
			CLOVIS NM
			LAS CRUCES NM
			SANTA FE NM
NV	WESTERN	NEVADA-SIERRA DISTRICT	HENDERSON NV
			LAS VEGAS NV
			NOR LAS VEGAS NV
			RENO NV
NY	NEW YORK METRO	NEW YORK DISTRICT	BRONX NY
			New York City NY
		TRIBORO DISTRICT	BROOKLYN NY
			FLUSHING NY
			LONG ISLAND CITY NY
			STATEN ISLAND NY
			JAMAICA NY
		WESTCHESTER DISTRICT	MOUNT VERNON NY
			WHITE PLAINS NY
YONKERS NY			

CITIES WITH STATIONS/ BRANCHES UNDER CONSIDERATION			
STATE	Area	District Name	CITY
	NORTHEAST	ALBANY DISTRICT	ALBANY NY
			SCHENECTADY NY
			SYRACUSE NY
		WESTERN NEW YORK DISTRICT	BUFFALO NY
			ROCHESTER NY
OH	EASTERN	CINCINNATI DISTRICT	CINCINNATI OH
			DAYTON OH
			HAMILTON, OH
			TOLEDO OH
		COLUMBUS DISTRICT	COLUMBUS, OH
			ZANESVILLE, OH
		NORTHERN OHIO DISTRICT	AKRON OH
			CANTON OH
			CLEVELAND OH
MANSFIELD OH			
YOUNGSTOWN, OH			
OK	SOUTHWEST	OKLAHOMA DISTRICT	OKLAHOMA CITY OK
			TULSA OK
OR	WESTERN	PORTLAND DISTRICT	BEAVERTON OR
			BEND OR
			EUGENE OR
			MEDFORD OR
			PORTLAND OR
			SALEM OR
PA	EASTERN	CENTRAL PENNSYLVANIA DISTRICT	ALLENTOWN, PA
			BETHLEHEM, PA
			HARRISBURG PA
			LANCASTER, PA
			READING PA
			SCRANTON PA
			WILKES-BARRE PA
			YORK PA
		ERIE DISTRICT	ALTOONA, PA
			ERIE PA
		PHILADELPHIA METROPOLITAN DISTRICT	NORRISTOWN PA
			PHILADELPHIA PA
PITTSBURGH DISTRICT	PITTSBURGH PA		
PR	NEW YORK METRO	CARIBBEAN DISTRICT	CAROLINA PR
			Ponce PR
			SAN JUAN PR

CITIES WITH STATIONS/ BRANCHES UNDER CONSIDERATION			
STATE	Area	District Name	CITY
RI	NORTHEAST	SOUTHEAST NEW ENGLAND DISTRICT	PAWTUCKET RI
			PROVIDENCE RI
SC	CAPITAL METRO	GREATER SOUTH CAROLINA DISTRICT	CHARLESTON SC
			CHARLESTON, SC
			COLUMBIA SC
			GREENVILLE SC
			MYRTLE BEACH SC
			SPARTANBURG SC
SD	WESTERN	DAKOTAS DISTRICT	RAPID CITY SD
			SIOUX FALLS SD
TN	SOUTHEAST	TENNESSEE DISTRICT	CHATTANOOGA TN
			CLARKSVILLE TN
			JACKSON TN
			JOHNSON CITY TN
			KNOXVILLE TN
			MEMPHIS TN
			MURFREESBORO TN
			NASHVILLE TN
			OLD HICKORY TN
			TX
GARLAND TX			
IRVING TX			
LEWISVILLE TX			
MESQUITE TX			
PLANO TX			
TEXARKANA TX			
TYLER TX			
FORT WORTH DISTRICT	ABILENE TX		
	AMARILLO TX		
	ARLINGTON TX		
	DENTON TX		
	FT WORTH TX		
	LUBBOCK TX		
HOUSTON DISTRICT	WICHITA FALLS TX		
	BEAUMONT TX		
	BRYAN TX		
	HOUSTON TX		
	HUMBLE TX		
	KATY TX		
	PASADENA TX		
	SPRING TX		

CITIES WITH STATIONS/ BRANCHES UNDER CONSIDERATION				
STATE	Area	District Name	CITY	
		RIO GRANDE DISTRICT	AUSTIN TX	
			BROWNSVILLE TX	
			CORPUS CHRISTI TX	
			EL PASO TX	
			KILLEEN TX	
			LAREDO TX	
			MCALLEN TX	
			MIDLAND TX	
			SAN ANTONIO TX	
			WACO TX	
UT	WESTERN	SALT LAKE CITY DISTRICT	OGDEN UT	
			PROVO UT	
			SALT LAKE CITY UT	
VA	CAPITAL METRO	NORTHERN VIRGINIA DISTRICT	ALEXANDRIA VA	
			ARLINGTON VA	
			FAIRFAX, VA	
			SPRINGFIELD VA	
			WOODBIDGE, VA	
			RICHMOND DISTRICT	CHESAPEAKE VA
				HAMPTON VA
				NEWPORT NEWS, VA
				NORFOLK VA
				RICHMOND, VA
	EASTERN	APPALACHIAN DISTRICT	VIRGINIA BEACH VA	
			ROANOKE, VA	
WA	WESTERN	PORTLAND DISTRICT	BRISTOL, VA	
			VANCOUVER WA	
		SEATTLE DISTRICT	AUBURN WA	
			BELLEVUE WA	
			EVERETT WA	
			KENT WA	
			OLYMPIA WA	
			RENTON WA	
			SEATTLE WA	
			TACOMA WA	
YAKIMA WA				
		SPOKANE DISTRICT	SPOKANE WA	
WI	GREAT LAKES	LAKELAND DISTRICT	GREEN BAY WI	
			KENOSHA WI	
			RACINE WI	
			WAUKESHA WI	
	WESTERN	NORTHLAND DISTRICT	LA CROSSE WI	
WV	EASTERN	APPALACHIAN DISTRICT	CHARLESTON WV	