

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

RETAIL ACCESS OPTIMIZATION INITIATIVE, 2011

Docket No. N2011-1

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO DAVID POPKIN INTERROGATORIES DBP/USPS-1 THROUGH 18**

The United States Postal Service hereby provides the responses of witness James Boldt to the above-listed interrogatories of David Popkin dated July 28, 2011.

Each interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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August 4, 2011

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DAVID POPKIN**

DBP/USPS-1

Please provide a listing of the scenarios under which a customer who receives mail delivery at a facility that is discontinued or consolidated will be able to continue to use their existing address.

RESPONSE

One change in the nature of postal services that customers may experience pertains to Post Office Box service. The Postal Service expects that no existing box customers would be disenfranchised, but some may experience address changes in box number or ZIP Code. If a discontinued Post Office, station or branch is consolidated with a neighboring unit, there may be instances where the Postal Service will decide to relocate the Post Office Box section from a consolidated facility to a gaining office. Depending on the size of the gaining facility, the ZIP Code of the consolidated facility, and the physical box section of the gaining office, some changes to Post Office Box addresses may prove necessary. In some such instances, the solution may be to relocate boxes to a cluster box unit or to a leased non-personnel Post Office Box unit. In some cases, some mail recipients may avoid such changes. Reasonable alternatives will be explored in order to minimize the need for address changes for recipients whose mail is delivered to a Post Office box unit that is discontinued.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DAVID POPKIN**

DBP/USPS-2

Please provide a listing of the scenarios under which a customer who receives mail delivery at a facility that is discontinued or consolidated will not be able to continue to use their existing address.

RESPONSE

See the response to DBP/USPS-1.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DAVID POPKIN**

DBP/USPS-3

- [a] Will the Postal Service take into account the effect on customers who will be required to change their address as a result of the discontinuance or consolidation of a facility?
- [b] If not, why not?

RESPONSE

Yes. See the response to DBP/USPS-1.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DAVID POPKIN**

DBP/USPS-4

Please provide a listing of the actions it believes will be necessary on the part of a customer who is unable to maintain their existing address as a result of the discontinuance or consolidation of a facility.

RESPONSE

Please see the response to DBP/USPS-1. In order for customers who experience a change of delivery address to minimize any disruption in mail delivery, it is advisable that such customers inform correspondents of their new delivery address and a date on which the change is expected to take effect.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DAVID POPKIN**

DBP/USPS-5

Please confirm, or explain if you are unable to confirm, that the listing provided in the Library Reference consists of independent post offices and classified stations/branches.

RESPONSE

Confirmed.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DAVID POPKIN**

DBP/USPS-6

The Postal Service utilizes the term “alternate access site” in determining those facilities to be studied for discontinuance of a facility. An “Approved Shipper” is included in that definition.

- [a] Please provide a listing of those postal services that are available at an independent post office or classified station/branch that are not available at an Approved Shipper.
- [b] Please provide a listing of those postal services that are available at an Approved Shipper that are not available at an independent post office or classified station/branch.

RESPONSE

Please see the attachment to this response.

| Product | Brick & Mortar | | | Online Channels | | | Mail | | Phone |
|---|----------------|-------------------------|------------------------|-----------------|------|------------|------------------|--------------------|-------|
| | Retail Counter | Automated Postal Center | Contract Postal Center | USPS.com | ebay | PC Postage | Stamps by Retail | Stamps Fulfillment | |
| Mailing | | | | | | | | | |
| Domestic | | | | | | | | | |
| First Class Large Envelope | ✓ | ✓ | ✓ | | | ✓ | ✓ | ✓ | ✓ |
| First Class Letter | ✓ | ✓ | ✓ | | | ✓ | ✓ | ✓ | ✓ |
| First-Class International | ✓ | ✓ | ✓ | | | ✓ | ✓ | ✓ | ✓ |
| First-Class International Large Env | ✓ | ✓ | ✓ | | | ✓ | ✓ | ✓ | ✓ |
| Express Mail Flat Rate Post Office to Addressee | ✓ | ✓ | ✓ | | | ✓ | ✓ | ✓ | ✓ |
| Express Mail Hold for Pickup | ✓ | ✓ | ✓ | | | ✓ | ✓ | ✓ | ✓ |
| Express Mail Hold for Pickup flat rate | ✓ | ✓ | ✓ | | | ✓ | ✓ | ✓ | ✓ |
| Express Mail Post Office to Addressee | ✓ | ✓ | ✓ | | | ✓ | ✓ | ✓ | ✓ |
| PM APO/FPO Flat Rate Box | ✓ | ✓ | ✓ | | | ✓ | ✓ | ✓ | ✓ |
| PM Medium Flat Rate Box | ✓ | ✓ | ✓ | | | ✓ | ✓ | ✓ | ✓ |
| PM Small Flat Rate Box | ✓ | ✓ | ✓ | | | ✓ | ✓ | ✓ | ✓ |
| PM Flat Rate Box | ✓ | ✓ | ✓ | | | ✓ | ✓ | ✓ | ✓ |
| PM Flat Rate Envelope | ✓ | ✓ | ✓ | | | ✓ | ✓ | ✓ | ✓ |
| Domestic | | | | | | | | | |
| PM Large Flat Rate Box | ✓ | ✓ | ✓ | | | ✓ | ✓ | ✓ | ✓ |
| Priority Mail - Weight based | ✓ | ✓ | ✓ | | | ✓ | ✓ | ✓ | ✓ |
| First Class Parcel | ✓ | ✓ | ✓ | | | ✓ | ✓ | ✓ | ✓ |
| Library Mail | ✓ | ✓ | ✓ | | | ✓ | ✓ | ✓ | ✓ |
| Media Mail (Book Rate) | ✓ | ✓ | ✓ | | | ✓ | ✓ | ✓ | ✓ |
| Parcel Post | ✓ | ✓ | ✓ | | | ✓ | ✓ | ✓ | ✓ |
| Domestic Matter for the Blind | ✓ | ✓ | ✓ | | | ✓ | ✓ | ✓ | ✓ |
| Bound Printed Matter | ✓ | ✓ | ✓ | | | ✓ | ✓ | ✓ | ✓ |
| Express Mail International | ✓ | ✓ | ✓ | | | ✓ | ✓ | ✓ | ✓ |
| Express Mail International Flat Rate | ✓ | ✓ | ✓ | | | ✓ | ✓ | ✓ | ✓ |
| Global Express Guaranteed | ✓ | ✓ | ✓ | | | ✓ | ✓ | ✓ | ✓ |
| PM International Large Flat Rate Box | ✓ | ✓ | ✓ | | | ✓ | ✓ | ✓ | ✓ |
| Priority Mail International | ✓ | ✓ | ✓ | | | ✓ | ✓ | ✓ | ✓ |
| Priority Mail International Flat Rate Box | ✓ | ✓ | ✓ | | | ✓ | ✓ | ✓ | ✓ |
| Priority Mail International Flat Rate Envelope | ✓ | ✓ | ✓ | | | ✓ | ✓ | ✓ | ✓ |
| First-Class International Package | ✓ | ✓ | ✓ | | | ✓ | ✓ | ✓ | ✓ |
| Airmail M-Bag | ✓ | ✓ | ✓ | | | ✓ | ✓ | ✓ | ✓ |
| Matter for the Blind by Air | ✓ | ✓ | ✓ | | | ✓ | ✓ | ✓ | ✓ |
| Certificate of Mailing | ✓ | ✓ | ✓ | | | ✓ | ✓ | ✓ | ✓ |
| Domestic Balloon Parcel Post | ✓ | ✓ | ✓ | | | ✓ | ✓ | ✓ | ✓ |
| Domestic Balloon Priority Mail | ✓ | ✓ | ✓ | | | ✓ | ✓ | ✓ | ✓ |
| Domestic Certificate of Mailing | ✓ | ✓ | ✓ | | | ✓ | ✓ | ✓ | ✓ |
| Domestic Certified | ✓ | ✓ | ✓ | | | ✓ | ✓ | ✓ | ✓ |
| Shipping | | | | | | | | | |
| Referred to Bulk Mail Center | | | | | | | | | |
| Referred to Local PO | | | | | | | | | |

Extra Services

- Domestic COD
- Domestic Delivery Confirmation
- Domestic Electronic Return Receipt
- Domestic First Class Enclosure
- Domestic Insurance
- Domestic Non-Machinable Parcel Post
- Domestic Non-Standard
- Domestic Oversize Parcel Post
- Domestic Parcel Air Lift
- Domestic Registered with Insurance
- Domestic Restricted Delivery
- Domestic Return Receipt
- Domestic Return Receipt for Merchandise
- Domestic Signature Confirmation
- Domestic Special Handling
- Live Animal Surcharge
- Return Receipt After Mailing
- International Certificate of Mailing
- International Insurance
- International Registered
- International Restricted Delivery
- International Return Receipt
- Non-Machinable First-Class International Surcharge

| Product | Erick & Mortar | | | Online Channels | | | Mail | | Phone |
|--|----------------|-------------------------|-----------------------|-----------------|------|------------|----------------|--------------------|-------|
| | Retail Counter | Automated Postal Center | Contact Postal Center | USPS.com | efay | PC postage | Stamps by Mail | Stamps Fulfillment | |
| Domestic COD | ✓ | | ✓ | | | ✓ | | | ✓ |
| Domestic Delivery Confirmation | ✓ | | ✓ | | | ✓ | | | ✓ |
| Domestic Electronic Return Receipt | ✓ | | ✓ | | | ✓ | | | ✓ |
| Domestic First Class Enclosure | ✓ | | ✓ | | | ✓ | | | ✓ |
| Domestic Insurance | ✓ | | ✓ | ✓ | ✓ | ✓ | | | ✓ |
| Domestic Non-Machinable Parcel Post | ✓ | | ✓ | | | ✓ | | | ✓ |
| Domestic Non-Standard | ✓ | | ✓ | | | ✓ | | | ✓ |
| Domestic Oversize Parcel Post | ✓ | | ✓ | | | ✓ | | | ✓ |
| Domestic Parcel Air Lift | ✓ | | ✓ | | | ✓ | | | ✓ |
| Domestic Registered with Insurance | ✓ | | ✓ | | | ✓ | | | ✓ |
| Domestic Restricted Delivery | ✓ | | ✓ | | | ✓ | | | ✓ |
| Domestic Return Receipt | ✓ | | ✓ | | | ✓ | | | ✓ |
| Domestic Return Receipt for Merchandise | ✓ | | ✓ | ✓ | ✓ | ✓ | | | ✓ |
| Domestic Signature Confirmation | ✓ | | ✓ | | | ✓ | | | ✓ |
| Domestic Special Handling | ✓ | | ✓ | | | ✓ | | | ✓ |
| Live Animal Surcharge | ✓ | | ✓ | | | ✓ | | | ✓ |
| Return Receipt After Mailing | ✓ | | ✓ | | | ✓ | | | ✓ |
| International Certificate of Mailing | ✓ | | ✓ | | | ✓ | | | ✓ |
| International Insurance | ✓ | | ✓ | | | ✓ | | | ✓ |
| International Registered | ✓ | | ✓ | | | ✓ | | | ✓ |
| International Restricted Delivery | ✓ | | ✓ | | | ✓ | | | ✓ |
| International Return Receipt | ✓ | | ✓ | | | ✓ | | | ✓ |
| Non-Machinable First-Class International Surcharge | ✓ | | ✓ | | | ✓ | | | ✓ |

| Product | Brick & Mortar | | | Online Channels | | | | Mail | | Phone |
|---|----------------|-------------------------|-----------------------|-----------------|------|------------|----------------|-----------------------|-------------|------------------------------|
| | Retail Counter | Automated Postal Center | Connect Postal Center | USPS.com | ebay | PC postage | Stamps by Mail | Stamps by Fulfillment | Call Center | |
| Permit Imprint First-Class Mail Postage | ✓ | | | | | | | | | Referred to Bulk Mail Center |
| Permit Imprint-Standard Mail (not non-profit) | ✓ | | | | | | | | | Referred to Bulk Mail Center |
| Permit Imprint- Bound Printed Matter Postage | ✓ | | | | | | | | | Referred to Bulk Mail Center |
| Permit Imprint-International (only) Postage | ✓ | | | | | | | | | Referred to Bulk Mail Center |
| Business Reply Mail - Annual Permit Fee | ✓ | | | | | | | | | Referred to Bulk Mail Center |
| Periodicals-Outside County (only) Postage | ✓ | | | | | | | | | Referred to Bulk Mail Center |
| Annual Bulk Mailing Fees | ✓ | | | | | | | | | Referred to Bulk Mail Center |
| Periodicals Application Fees | ✓ | | | | | | | | | Referred to Bulk Mail Center |
| Permit Imprint Application Fees | ✓ | | | | | | | | | Referred to Bulk Mail Center |
| Merchandise Return Permit Fee | ✓ | | | | | | | | | Referred to Bulk Mail Center |
| Parcel Select-Annual Mailing Fee | ✓ | | | | | | | | | Referred to Bulk Mail Center |
| Permit Imprint-Media Mail and Library Mail | ✓ | | | | | | | | | Referred to Bulk Mail Center |
| Permit Imprint -Standard Mail-Nonprofit | ✓ | | | | | | | | | Referred to Bulk Mail Center |
| Freedom of Information Fees | ✓ | | | | | | | | | Referred to Bulk Mail Center |
| Lobby Services Revenue | ✓ | | | | | | | | | Referred to Bulk Mail Center |
| Miscellaneous Non-Postal Revenue | ✓ | | | | | | | | | Referred to Bulk Mail Center |
| Privacy Act Copying Fees | ✓ | | | | | | | | | Referred to Bulk Mail Center |
| Change of Address Information Fees | ✓ | | | | | | | | | Referred to Bulk Mail Center |
| USPS Customs Fees and Storage Charges | ✓ | | | | | | | | | Referred to Bulk Mail Center |
| Customs Collections | ✓ | | | | | | | | | Referred to Bulk Mail Center |
| Vending Equipment Postage Sales | ✓ | | | | | | | | | Referred to Bulk Mail Center |
| Money Orders | ✓ | | | | | | | | | Referred to Local PO |
| Carrier Pick Up | ✓ | | | | | | | | | Referred to Local PO |
| Hold Mail | ✓ | | | | | | | | | Referred to Local PO |
| Mail Pick Up | ✓ | | | | | | | | | Referred to Local PO |
| Free Shipping Supplies | ✓ | | | | | | | | | Referred to Local PO |
| ZIP Code Lookup | ✓ | | | | | | | | | Referred to Local PO |
| Rate Calculator | ✓ | | | | | | | | | Referred to Local PO |
| Change of Address | ✓ | | | | | | | | | Referred to Local PO |

* ATM and Conignment offer stamps only.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DAVID POPKIN**

DBP/USPS-7

The Postal Service utilizes the term “alternate access site” in determining those facilities to be studied for discontinuance of a facility. A “Stamp Consignment Location” is included in that definition.

- [a] Please provide a listing of those postal services that are available at an independent post office or classified station/branch that are not available at a stamp consignment location.
- [b] Please provide a listing of those postal services that are available at a stamp consignment location that are not available at an independent post office or classified station/branch.

RESPONSE

Please see the attachment to the response to DBP/USPS-6.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DAVID POPKIN**

DBP/USPS-8

The Postal Service utilizes the term “alternate access site” in determining those facilities to be studied for discontinuance of a facility. A “Contract Postal Unit” is included in that definition.

- [a] Please provide a listing of those postal services that are available at an independent post office or classified station/branch that are not available at a Contract Postal Unit
- [b] Please provide a listing of those postal services that are available at a Contract Postal Unit that are not available at an independent post office or classified station/branch.

RESPONSE

Please see the attachment to the response to DBP/USPS-6.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DAVID POPKIN**

DBP/USPS-9

Please confirm, or explain if you are unable to confirm, that the criteria of being within a certain distance of at least five alternate access sites will be satisfied regardless of the type of alternate access site involved.

RESPONSE

Confirmed.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DAVID POPKIN**

DBP/USPS-10

- [a] Please advise how the two mile and half mile distances for alternate access sites were determined including whether criteria such as major highways, bodies of water, bridges or tunnels, etc. are considered.
- [b] Please confirm that the distance is the distance between the facility being considered and the location of the alternate access site.

RESPONSE

- (a) This distance was chosen because it represents a reasonable distance for assessing whether there were five or more alternate access sites in close proximity to a station or branch to warrant whether discontinuance of that facility should be considered as part of the RAO Initiative. The "5 within 2.5" was deemed to be a reasonable basis for determining how broadly the RAO "net" should be cast over stations and branches. The "5 within 2.5" threshold is not the only reasonable combination of variables that could have been chosen. Some other combination might have increased or decreased the number of stations and branches in the candidate pool. One of the Postal Service's goals in establishing the scope of the RAO Initiative was to avoid an undertaking that might prove unwieldy to manage. It should be emphasized that the "5 within 2.5" threshold is only used purposes of identifying a category of candidates to be examined for purposes of this Initiative. The factors used to decide whether to discontinue operating a particular facility are in USPS Handbook PO-101.
- (b) Confirmed. However, when discontinuance review is conducted under the PO-101, driving distance is typically used to measure proximity between postal facilities and alternate access locations.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DAVID POPKIN**

DBP/USPS-11

- [a] Please advise the rationale for establishing a criteria for the second category that the FY 2010 revenue is less than the average of the FY 2008 and FY 2009 revenues.
- [b] Please advise the rationale for including this requirement in the second category only.
- [c] Please advise the percentage of facilities in the entire country that have a FY 2010 revenue that is less than the average of the FY 2008 and FY 2009 revenues.
- [d] What is the total revenue for the Postal Service for FY 2008, FY 2009, and FY 2010?

RESPONSE

- (a) Please see the response to DBP/USPS-10(a). It was deemed reasonable to include retail facilities in the second category that had experienced a decline in retail walk-in revenue within the candidate pool and exclude those that had not.
- (b) Please see the response to DBP/USPS-10(a). The criteria used to identify facilities in the second category of the candidate pool were deemed to be a reasonable basis for determining how broadly the RAO net would be cast in the direction of stations and branches. It should be emphasized that the declining walk-in revenue criterion is only used to identify candidates for discontinuance review. The USPS Handbook PO-101 factors used to decide whether to discontinue operating a particular facility.
- (c) Approximately 71 percent.
- (d) According to the USPS FY 2010 Annual Report, rounded total revenues were as follows: \$74.968 billion (FY 2008), \$68.116 billion (FY 2009) and \$67.077 billion (FY 2010).

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DAVID POPKIN**

DBP/USPS-12

- [a] In a facility that has multiple units, is the revenue amount to meet the criteria [\$10,000 / \$27,500 / \$600,000 / \$1,000,000] for inclusion on the list of facilities for each individual unit or is it for all units in a ZIP Code or Post Office combined?
- [b] Please explain the rationale for the response to subpart [a].

RESPONSE

- (a) For purposes of facility-specific discontinuance review, the pertinent walk-in revenues are those that can be attributed to the specific facility being studied for discontinuance. Accordingly, revenues for subordinate stations or branches are to be excluded when a Post Office is being studied. Likewise, Post Office revenues are not to be included when a subordinate station or branch is being studied.
- (b) Such an approach seems better suited to determining whether a specific facility should be considered for discontinuance review than if revenue not associated with that facility influenced the determination.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DAVID POPKIN**

DBP/USPS-13

- [a] Please advise what items are included in the revenue amount used to meet the criteria [\$10,000 / \$27,500 / \$600,000 / \$1,000,000] for evaluating a specific facility.
- [b] Please advise what revenue items are not included.
- [c] Please advise the rationale for not including the items in response to subpart [b] in the revenue amount used in the study.

RESPONSE

- (a) Please see the attachment to this response. Items on the list consisting of walk-in revenue used to establish these criteria are shaded (in green).
- (b) Please see the attachment to this response. The revenue items not shaded are not walk-in revenue and, therefore, are not included.
- (c) Because the overwhelming majority of customers who visit postal retail locations are walk-in customers and their transactions generate significant retail workload, walk-in revenue seemed a reasonable criterion to use in identifying which retail facilities to subject to discontinuance review as part of the RAO Initiative. It bears repeating that these threshold figures are not controlling factors in the Handbook PO-101 review process that determines whether to discontinue the operation of retail facilities.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DAVID POPKIN**

DBP/USPS-14

Please explain the rationale for choosing each of the criteria [the dollar amounts of revenue, the distances to and number of the alternate access sites, etc.] for inclusion on the list of facilities to be studied.

RESPONSE

Please see the responses to DBP/USPS-10, 11(a&b), 12 and 13. As emphasized there, other reasonable criteria could have been selected, but might have generated more or fewer candidate facilities to review for discontinuance.

The RAO Initiative requires the Postal Service to use its recently amended discontinuance process on an accelerated basis. It seems prudent to ensure that the scope of the RAO Initiative is manageable while local discontinuance review personnel adjust to the new procedures while balancing their RAO Initiative duties with other day-to-day responsibilities.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DAVID POPKIN**

DBP/USPS-15

Please advise the procedure that was followed with respect to the scenario of overlapping alternate access sites. For example in evaluating location A, assume that there are only five alternate access sites within the specified distance of location A and one of these sites is location B and evaluation of location B meets the criteria for inclusion on the list. If location B should then be discontinued or consolidated, there would only be four alternate access sites for location A.

RESPONSE

The arithmetic in your hypothetical is correct. However, the existence of five alternate access locations (including postal retail sites) within a specified proximity of a postal retail location subject to discontinuance review is only a factor in determining whether it is a candidate for discontinuance review as part of the RAO Initiative. There is no specific number of nearby alternate access sites that serves as a controlling factor in the USPS Handbook PO-101 process used to determine whether to discontinue operation of a retail facility. Such determinations will be made on a case-by-case basis under the PO-101.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DAVID POPKIN**

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.

RESPONSE

- (a-c) The question in subpart (a) is not clear. Whether a specific alternate access site is available to provide service on a Saturday is site-specific and considered as part of the USPS Handbook PO-101 review process. However, it was not considered as part of the process for identifying RAO Initiative candidate facilities to subject to that review process.
- (d) See the attachment to this response.

| Area | District | % of offices with retail window hours but not open Saturday | |
|--------------------------------|----------------------|---|--|
| CAPITAL METRO (K) | ATLANTA | 13% | |
| CAPITAL METRO (K) | BALTIMORE | 7% | |
| CAPITAL METRO (K) | CAPITAL | 23% | |
| CAPITAL METRO (K) | GREATER SO CAROLINA | 14% | |
| CAPITAL METRO (K) | GREENSBORO | 24% | |
| CAPITAL METRO (K) | MID-CAROLINAS | 47% | |
| CAPITAL METRO (K) | NORTHERN VIRGINIA | 7% | |
| CAPITAL METRO (K) | RICHMOND | 19% | |
| CAPITAL METRO (K) Total | | 21% | |
| EASTERN (C) | APPALACHIAN | 5% | |
| EASTERN (C) | CENTRAL PENNSYLVANIA | 2% | |
| EASTERN (C) | CINCINNATI | 4% | |
| EASTERN (C) | KENTUCKIANA | 3% | |
| EASTERN (C) | NORTHERN OHIO | 3% | |
| EASTERN (C) | PHILADELPHIA METROPO | 10% | |
| EASTERN (C) | SOUTH JERSEY | 3% | |
| EASTERN (C) | TENNESSEE | 7% | |
| EASTERN (C) | WESTERN NEW YORK | 2% | |
| EASTERN (C) | WESTERN PENNSYLVANIA | 3% | |
| EASTERN (C) Total | | 4% | |
| GREAT LAKES (J) | CENTRAL ILLINOIS | 2% | |
| GREAT LAKES (J) | CHICAGO | 22% | |
| GREAT LAKES (J) | DETROIT | 6% | |
| GREAT LAKES (J) | GATEWAY | 4% | |
| GREAT LAKES (J) | GREATER INDIANA | 1% | |
| GREAT LAKES (J) | GREATER MICHIGAN | 7% | |
| GREAT LAKES (J) | LAKELAND | 2% | |
| GREAT LAKES (J) Total | | 4% | |
| NORTHEAST (B) | ALBANY | 1% | |
| NORTHEAST (B) | CARIBBEAN | 6% | |
| NORTHEAST (B) | CONNECTICUT VALLEY | 5% | |
| NORTHEAST (B) | GREATER BOSTON | 9% | |
| NORTHEAST (B) | LONG ISLAND | 3% | |
| NORTHEAST (B) | NEW YORK | 30% | |
| NORTHEAST (B) | NORTHERN NEW ENGLAND | 1% | |
| NORTHEAST (B) | NORTHERN NEW JERSEY | 12% | |
| NORTHEAST (B) | TRIBORO | 20% | |
| NORTHEAST (B) | WESTCHESTER | 2% | |
| NORTHEAST (B) Total | | 5% | |
| PACIFIC (F) | BAY VALLEY | 48% | |
| PACIFIC (F) | HONOLULU | 32% | |
| PACIFIC (F) | LOS ANGELES | 48% | |

| | | | |
|----------------------------|------------------|------------|--|
| PACIFIC (F) | SACRAMENTO | 72% | |
| PACIFIC (F) | SAN DIEGO | 47% | |
| PACIFIC (F) | SAN FRANCISCO | 71% | |
| PACIFIC (F) | SANTA ANA | 47% | |
| PACIFIC (F) | SIERRA COASTAL | 51% | |
| PACIFIC (F) Total | | 56% | |
| SOUTHWEST (G) | ALABAMA | 11% | |
| SOUTHWEST (G) | ARKANSAS | 11% | |
| SOUTHWEST (G) | DALLAS | 72% | |
| SOUTHWEST (G) | FT WORTH | 56% | |
| SOUTHWEST (G) | HOUSTON | 35% | |
| SOUTHWEST (G) | LOUISIANA | 45% | |
| SOUTHWEST (G) | MISSISSIPPI | 31% | |
| SOUTHWEST (G) | NORTH FLORIDA | 10% | |
| SOUTHWEST (G) | OKLAHOMA | 25% | |
| SOUTHWEST (G) | RIO GRANDE | 25% | |
| SOUTHWEST (G) | SOUTH FLORIDA | 30% | |
| SOUTHWEST (G) | SUNCOAST | 29% | |
| SOUTHWEST (G) Total | | 29% | |
| WESTERN (E) | ALASKA | 41% | |
| WESTERN (E) | ARIZONA | 35% | |
| WESTERN (E) | CENTRAL PLAINS | 4% | |
| WESTERN (E) | COLORADO/WYOMING | 4% | |
| WESTERN (E) | DAKOTAS | 13% | |
| WESTERN (E) | HAWKEYE | 10% | |
| WESTERN (E) | MID-AMERICA | 4% | |
| WESTERN (E) | NEVADA SIERRA | 53% | |
| WESTERN (E) | NORTHLAND | 7% | |
| WESTERN (E) | PORTLAND | 77% | |
| WESTERN (E) | SALT LAKE CITY | 24% | |
| WESTERN (E) | SEATTLE | 47% | |
| WESTERN (E) Total | | 19% | |
| Grand Total | | 17% | |

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DAVID POPKIN**

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?

RESPONSE

The RAO Initiative is focused on determining whether to discontinue all retail operations at candidate facilities. If retail operations are the exclusive function of a facility, then discontinuance of retail operations at that location will result in all operations being discontinued at that location.

Outside of the scope of the RAO Initiative, it is possible that a determination could be made to relocate carrier operations at a facility that also provides retail service. Similarly, outside the RAO Initiative, a local determination could be made to relocate all or part of a Post Office Box section to a nearby facility.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DAVID POPKIN**

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.

RESPONSE

Cost savings are expected to result from the RAO Initiative. However, neither the Request nor the testimony filed in support of it contains a claim or estimate of one-time or annual savings financial savings that will result from discontinuance or consolidation of any particular postal retail facility under consideration as part of the Initiative or an aggregate RAO Initiative claim or estimate.

The Request and testimony refer to a process being employed to identify facilities to consider for discontinuance, and to develop estimates on a case-by-case basis of potential operating cost savings that could result from discontinuance of facilities for which studies are completed for purposes of decision-making. Both documents also indicate that facility-specific analysis is underway, but that the first decisions will not be made until October 2011. Accordingly, the first facility-specific studies are not expected to be completed until then.

At that time, the Postal Service will have estimates of the savings expected for specific facilities for which studies have been completed and discontinuance decisions have been made. Any estimate or projection of cumulative cost savings made before the Initiative has run its course would be speculative.