

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

RETAIL ACCESS OPTIMIZATION INITIATIVE, 2011

DOCKET NO. N2011-1

INTERROGATORIES OF DAVID B. POPKIN TO THE UNITED STATES POSTAL
SERVICE [DBP/USPS-36 through 38]

David B. Popkin hereby requests the United States Postal Service to answer, fully and completely, the following interrogatories pursuant to the Commission's Rules of Practice and Procedure. Any reference to testimony or other sources should indicate the page and line numbers. The instructions contained in the interrogatories DFC/USPS-T1-1-6 in Docket MC2006-7 dated February 23, 2007, are incorporated herein by reference. I am available for informal discussion to respond to your request to "clarify questions and to identify portions of discovery requests considered overbroad or burdensome."

August 15, 2011

Respectfully submitted,

N20111F36

DAVID B. POPKIN, POST OFFICE BOX 528, ENGLEWOOD, NJ 07631-0528

DBP/USPS-36 Tables 1 and 2 of the Testimony show a truncated y- or vertical axis. Please provide a table with the same data except with the y- or vertical axis going all the way down to zero.

DBP/USPS-37 [a] Are there presently any plans to add facilities to the listing of those facilities already provided for study for discontinuance or consolidation?

[b] If so, when will the listing be provided and under what circumstances will these new facilities be added?

[c] If not, how long is it believed that it will be before new facilities will be added?

[d] Please define the terms discontinuance and consolidation and provide an explanation under which each of them will be utilized.

DBP/USPS-38 The Englewood NJ Post Office Annex 07631 is on the list of facilities being studied. There are at least four functions being conducted at this facility, namely: retail sales, post office boxes, carrier annex, mail dispatching to/from the P&DC.

[a] Are there any other functions being conducted at this facility?

[b] Which of the four or more functions being conducted at the facility are being studied for discontinuance or consolidation?