

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

RETAIL ACCESS OPTIMIZATION INITIATIVE)
)
) Docket No. N2011-1

**INTERROGATORIES OF THE UNITED STATES POSTAL SERVICE
TO NATIONAL LEAGUE OF POSTMASTERS WITNESS DONALD HOBBS
(USPS/NLPM-RT2-1 THROUGH 23)**

Pursuant to Rules 25 through 27 of the Postal Regulatory Commission's Rules of Practice and Procedure, the Postal Service respectfully submits the following discovery requests to National League of Postmasters witness Donald Hobbs (NLPM-RT-2). Incorporated herein are the definitions and instructions accompanying the September 29, 2011 interrogatories directed by the Postal Service to NAPUS witness Artery.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:
Anthony F. Alverno
Chief Counsel, Global Business

Michael T. Tidwell

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-3083
(202) 268-2998, Fax -5402
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USPS/NLPM-RT2-1

- (a) In addition to yourself, please identify all corporations, partnerships, businesses, commercial entities, governmental and non-profit entities, other organizations and individuals who serve as sources of funding, governance or direction for lowans for Post Office Services.
- (b) Please indicate which entities or individuals identified in response to subpart (a) own or control properties that currently are leased to the United States Postal Service in Iowa. For each, indicate the number of such properties, and the city and street address for each.

USPS/NLPM-RT2-2

Please refer to page 1, line 22 of your testimony. Please describe in detail all activities and provide copies of all documents directed by IPOS to elected and appointed United States government officials since January 2010 related to efforts by IPOS to "help save" the United States Postal Service.

USPS/NLPM-RT2-3

Please provide all documents related to all surveys and research underlying the proclamation attributed to "[m]any citizens and business owners" at page 4, lines 21-22 of your testimony.

USPS/NLPM-RT2-4

Please indicate whether, to your knowledge, the owner of the business described at page 4, lines 22-23 of your testimony creates, records, and/or files any bills, statements, bids or bill payments referenced at pages 4-5 in a computer-generated format. If your response is affirmative, please describe in detail the "extra effort" that would be involved in that business sending such documents to customers by electronic means compared to the effort of sending such documents by mail.

USPS/NLPM-RT2-5

- (a) Please confirm that the population of Lohrville decreased by more than 17 percent from the year 2000 to the year 2009. If you do not confirm, please explain.
- (b) Please list and describe all factors other than human mortality that have, to your knowledge, contributed to the change in population.
- (c) Please indicate whether and by how much the population of Calhoun County has increased or decreased since the 2000 census.
- (d) Please list and describe the factors other than human mortality and/or birth that have, that have, to your knowledge, contributed to this trend.

USPS/NLPM-RT2-5

- (a) Please list and describe the nature of the business entities located within the city of Lohrville.
- (b) Is it your opinion that there is insufficient business or governmental activity in Lohrville to attract the services of a private firm that would provide daily collection and transport of outgoing mail from Lohrville businesses and local government agencies for entry in bulk at a Post Office in or outside the city limits? If so, please provide all documents underlying any analysis performed in support of that conclusion.

USPS/NLPM-RT2-6

Please refer to your testimony at page 8, line 9 and quantify the term "short."

USPS/NLPM-RT2-7

Please refer to your testimony at page 9, lines 5-6. Please indicate the approximate distances and normal driving times from Lohrville to:

- (a) the Post Office in Lake City to the west; and
- (b) the Post Office in Farnhamville to the east.
- (c) Please confirm that the approximate driving distance from your place of employment to its nearest postal retail location is approximately 0.2 miles.
- (d) How does the distance referenced in subpart (c) compare to the driving distance between your residence and its nearest postal retail location?

USPS/NLP-RT2-8

Please refer to your testimony at page 8, line 14. In your opinion, do the residents of Lohrville currently value their elderly neighbors sufficiently to volunteer to conduct postal transactions for them or make trips to the Post Office for them during periods of high heat, snow or ice?

USPS/NLPM-RT2-9

Please refer to your testimony at page 8, line 14. In your opinion, would the residents of Lohrville value their elderly neighbors sufficiently to volunteer to conduct postal transactions for them or make trips to the Post Office for them during periods of high heat, snow or ice, if the nearest available Post Office were in Lake City or Farnhamville?

USPS/NLPM-RT2-10

Please refer to your testimony at page 9, lines 6-8. Please identify all Post Offices that, to your knowledge, are "handling the business of several [others] that had been closed down" Please also indicate, if you can, whether any such closures were in the last three, five or ten years.

USPS/NLPM-RT2-11

Please refer to your testimony at page 9, lines 19-21. Please explain the basis for your understanding that the closing of a Post Office in a community means that outgoing mail from that community will never get cancelled on the same day it is deposited in the mailstream even if:

- (a) it is deposited in a blue collection box before the last scheduled pick-up time;
- (b) it is left in a residential mail receptacle for pick-up that day by a rural or city carrier before the carrier makes delivery.

USPS/NLPM-RT2-12

Please refer to page 10, lines 9-11. Is it your understanding that persons who have cars and are under pressure to economize their transportation expenses commonly do so by performing multiple tasks on a single driving trip: for instance, driving from home (or work) to the Post Office, and also to a nearby pharmacy, neighbor's residence, grocery store, and/or other retailer before returning home? If that is not your understanding, please explain.

USPS/NLPM-RT2-13

Please quantify your understanding of the degree to which residents of Calhoun County are employed outside of their residences and either drive an automobile solo or participate in a car pool to get to work.

USPS/NLPM-RT2-14

Please refer to page 11, lines 17-21. Is it your understanding that persons with low-to-moderate incomes who value their time commonly perform multiple tasks on a single driving trip: for instance, going from home (or work) to the Post Office, and also to a nearby pharmacy, neighbor's residence, grocery store, and/or other retailer before returning home? If that is not your understanding, please explain.

USPS/NLPM-RT2-15

Please refer to your testimony at page 12, lines 6-8. Please state the basis for your assertion that a rural Post Office has historically been in every community across America. In doing so, indicate whether you currently believe there to be a Post Office in every community or municipality in Calhoun County?

USPS/NLPM-RT2-16

Please indicate your understanding of the degree to which the incorporation of Lohrville as a municipality and its recognition by Calhoun County and the State of Iowa as such is contingent upon the presence of a Post Office within its city limits or the assignment of a 5-digit ZIP Code to the city.

USPS/NLPM-RT2-17

- (a) Aside from the existence of a Post Office, what other factors in your view contribute to a community's identity and image among its residents? Please discuss and rank the non-postal factors in relative order of importance.
- (b) Aside from the existence of a Post Office, what other factors in your view contribute to the image of a community by persons who are not residents? Please discuss and rank these non-postal factors in relative order of importance.
- (c) Please identify and provide references to (including electronic links) or, in the alternative, copies of to all sociological studies, economic analyses, public surveys, and other data sources you consulted in preparing your testimony.

USPS/NLPM-RT2-18

Please refer to your testimony at page 16, lines 4-5. Please provide all information that identifies any businesses in England that responded to the closure of a Post Office in their village by *actually* moving to another village just to have a Post Office within walking distance.

USPS/NLPM-RT2-19

Aside from proximity to a Post Office, please list all factors that businesses present to you as Mayor of Lohrville as being relevant and material to whether they would establish operations in Lohrville as opposed to a nearby community.

USPS/NLPM-RT2-20

Aside from proximity to a Post Office, please list all factors that businesses present to you as Mayor of Lohrville as being relevant and material to whether they would relocate from Lohrville to a nearby community.

USPS/NLPM-RT2-21

Aside from proximity to a Post Office, please list all factors that municipal and county economic development corporations (or local entities with similar missions) consider important to the prospect of sustaining and attracting economic development within their borders. Please discuss and rank these non-postal factors in relative order of importance.

USPS/NLPM-RT2-22

Please refer to pages 15-16 of your testimony.

- (a) Is there any competition among municipalities within Calhoun County to attract businesses to locate within or near their respective boundaries?
- (b) If so, aside from proximity to a Post Office, please list all factors within your knowledge that can contribute to businesses relocating between or choosing among communities within Calhoun County.
- (c) Aside from proximity to a Post Office, please list all factors within your knowledge that can contribute to businesses relocating or from Calhoun County to adjoining counties.

USPS/NLPM-RT2-23

Attached to this interrogatory is a copy of the Postal Operations Manual policy regarding bulletin boards in postal lobbies. Please describe the difference between "legal" and "mundane" public notices, as you use those terms in your testimony at page 12, lines 9-11, and describe examples of such notices posted by the city of Lohrville at the Lohrville Post Office during your tenure as Mayor.

Attachment to USPS/NLPM-RT2-23

125.361 Bulletin Boards

The following guidelines apply to the use of bulletin boards:

- a. Postmasters may install bulletin boards in public areas of Post Offices or set apart a convenient place to display official government notices, notices of public assemblies, judicial sales, official election notices issued by state or local government, and similar announcements. These display privileges must be afforded without discrimination.
- b. Bulletin boards may not display private business advertisements; placards, cards, or notices; photographs or likenesses of any member of state legislature or Congress; or political pictures, cartoons, or other designed to influence an election.
- c. Notices by members of Congress are limited to public announcements of pending competitive civil service examinations and pertinent information about application for appointment to the U.S. service academies. These notices are displayed only if current and within the district of the sponsoring representative or the state of the sponsoring senator. Such displays must conform to the specifications in this section. If a postmaster believes that a notice does not conform to these specifications, the postmaster may display the poster pending the decision of the area manager, Customer Service and Sales. Notices that include the member's picture must be returned to the member with an explanation of why they cannot be displayed. Such displays must:
 - (1) Be no larger than 9 by 12 inches.
 - (2) Contain no photograph, picture, or likeness of the member of Congress.
 - (3) Contain no signature and/or printed name of the member of Congress larger than 1/2-inch (48-point) type.
 - (4) Contain the closing date for submission of applications.
- d. If space is available, one recruiting notice (no larger than 8-1/2 by 11 inches) of each branch of the armed services may be placed on bulletin boards.

125.362 Voting Information

- The following guidelines apply to voting information:
- a. Any notices posted regarding voting may not contain any partisan political messages or symbols designed to influence the outcome of an election, including, but not limited to, photographs or other likenesses of incumbents or candidates for any public office. The notices must be no larger than 8-1/2 by 11 inches. Names and addresses of federal legislators may not appear in larger than 1/4-inch (18-point) type.
 - b. Such notices must be displayed in lobbies that have public bulletin boards. Each notice must remain posted only as long as it contains current information applying to customers served by the displaying postal facility and must be removed not more than 2 years from the date of receipt for posting. At locations where there is no public bulletin or there is not enough space on the board for individual display, the notices should be assembled for public inspection in a binder or on a clipboard. Nothing in this section precludes postmasters from displaying additional material on public bulletin boards as space permits, as provided in 125.361.