

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, DC 20268-0001

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)  
Station and Branch )  
Optimization and )  
Consolidation Initiative, 2009 )  
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Docket No. N2009-1

PUBLIC REPRESENTATIVE  
FIRST INTERROGATORIES AND REQUESTS FOR PRODUCTION OF  
DOCUMENTS TO UNITED STATES POSTAL SERVICE (PR/USPS-1-6)

(July 10, 2009)

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**

1. Each of the following discovery requests is continuing in nature and the Public Representative requests that if you obtain any additional responsive information or documents at any later date, you promptly so inform the Public Representative and submit supplemental or amended answers and documents.
2. If privilege is claimed with respect to any data, information, or documents requested herein, the party to whom the discovery request is directed should provide a privilege log (see, e.g., Docket No. C99-1, P.O. Ruling C99-1/9 at 4). Specifically, "the party shall make the claim expressly and shall describe the nature of the documents, communications, or things not produced or disclosed in a manner that, without revealing information itself privileged or protected, will enable other parties to assess the applicability of the privilege or protection." Fed. R. Civ. P. 26(b)(5).

3. If in response to any discovery request the Postal Service is unable to provide any of the requested documents or information, please state, with particularity, the reasons why the requested information cannot be provided.
4. In responding to any questions contained in the attached discovery requests that require any calculations, analysis, assumptions, or studies that have been prepared, please provide and identify copies of such calculations, analysis, assumptions, studies, and all workpapers relating thereto.
5. If an objection is made to only a part of a discovery request, please answer the remainder of the discovery request.
6. If data or information is not available in the exact format or level of detail requested, please provide such data or information (1) in a substantially similar format or level of detail or (2) in a format susceptible to being converted to the requested format and level of detail.
7. The term "Postal Service" includes all agents, employees, officers, directors, attorneys, representatives, and anyone acting on its behalf, as well as the Board of Governors, contractors, subcontractors to the Postal Service, and the Postal Service Office of Inspector General.
8. The terms "document" or "documents" are synonymous in meaning and equal in scope to the usage of the terms as defined by 16 CFR 3.34(b), including but not limited to the original or a copy of any letter, email, note, spreadsheet, memorandum, directive, report, study, meeting minutes, contract, diary entry or schedule, presentation, print out, speech, testimony, pamphlet, chart, tabulation, workpaper, draft, recording, and other writing or retrievable data or whatever kind or nature to which the Postal Service has or has had access to, regardless of origin or location, hardcopy or electronic, handwritten or typed. Documents should be produced in the way they are maintained.
9. The term "describe" means to detail in full, with specificity, the event or situation at issue.
10. The term "identify," (1) when used with regard to a person, means to provide the full name and position of the person, and (2) when used with regard to a document

means to describe the subject matter of the document, its author, the date, and any intended recipients.

11. The term “communication(s)” means the transmittal of information by any means and includes communications or any kind, whether written, oral, electronic, or other.

12. All “documents,” as defined above, responsive to discovery requests that can be located, discovered or obtained by reasonably diligent efforts, including without limitation all documents possessed by (a) you or your counsel or (b) any other person or entity from whom you can obtain such documents by request or which you have a legal right to bring within your possession by demand, should be produced.

13. Responses to requests for explanations or the derivation of numbers should be accompanied by workpapers.

14. The term “workpapers” includes all backup material whether prepared manually, mechanically or electronically. Such workpapers should, if necessary, be prepared as part of the witness’s responses and should allow a third party to understand how the witness took data from a primary source and developed that data to achieve a final result. If Excel-type spreadsheets are used, please provide a version of the worksheets that include the underlying formulas for each cell.

15. Unless otherwise noted, all postal related terms have the definitions of the current version of the Postal Service’s Publication 32 – Glossary of Postal Terms.

Respectfully Submitted,

/s/ Robert Sidman

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Public Representative for  
Docket No. N2009-1

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**PR/USPS-1**

The Postal Service's Request seeks an advisory opinion from the Postal Regulatory Commission on its "Postal Service Station and Branch Optimization and Consolidation Initiative" (Initiative). Request at 1. The Request states that the Initiative "*commences* with an examination of that portion of the retail network consisting of stations and branches that report to Postmasters at or above USPS' EAS-24 pay grade. *Id.* (emphasis added). Later, in two places, it mentions that this is the "initial focus." *Id.* at 5 and 6. The Postal Service suggests that "experience with this initial focus will inform any decision whether to continue or expand the Initiative to include a broader pool of stations and branches." *Id.* at 6.

- a. Please identify, describe and provide all documents detailing the potential full scope of the Initiative.
- b. Please identify, describe and provide all documents detailing the potential stages subsequent to the initial focus of the Initiative.
- c. Is it possible for the Initiative to include postal retail facilities that are not branches and stations (e.g., contractual postal units, community post offices, independent post offices, or post offices headed by a postmaster)? Please explain.
- d. The Request notes that branches and stations at or above the EAS-24 pay grade are located in "urban and suburban areas where Post Offices serve large communities." Request at 1. Later, it states that such branches and stations are "located primarily in urban and suburban population centers." Request at 6.
  1. Please provide the total number of branches and stations subject to the initial focus of this Initiative.
  2. Please provide the number and percentage of branches or stations subject to this Initiative are not located in urban or suburban areas. Please explain.
  3. Is it possible for the Initiative to include branches or stations serving communities that are not "large," as that term is used in the Request. Please explain.
  4. Please provide the number and percentage of branches or stations subject to this Initiative are located in communities that are not "large," as that term is used in the Request. Please explain.

- e. The Request states that these changes will not be implemented before October 2, 2009 and that the review process for EAS-24 and above stations and branches is expected to be completed during Fiscal Year 2010.
  - 1. When are the closings of the stations and branches that are deemed to be closed as a result of the initial focus of the Initiative expected to be completed?
  - 2. When are subsequent stages of this Initiative expected to begin and be completed?

## **PR/USPS-2**

At page 1 of the Request, the Postal Service explains that it “hereby requests the Postal Regulatory Commission [to] determine whether a plan to optimize the postal retail network by consolidating the operations of some retail stations and branches into nearby facilities constitutes a substantially nationwide change in the nature of postal services under 39 U.S.C. 3661. On page 2 of the Request, the Postal Service states that if the Commission determines that this optimization and consolidation plan will likely generate changes in the nature of postal services on at least a substantially nationwide basis, “then the Postal Service *also* hereby requests that the Commission issue an advisory opinion under section 3661(c) ... that *such service changes* would conform to the policies reflected in title 39, United States Code.” Request at 2 (emphasis added).

- a. Please confirm that upon completion of the “initial focus” (as that term is used on pages 5 and 6 of the Request) of the Initiative, the identified stations and branches proposed for consolidation or closure will be presented to the Commission as a complete list (along with the associated potential changes in postal services) for prior Commission review pursuant to section 3661(c).
- b. If your response to paragraph a of this interrogatory is anything other than an unqualified affirmative response, please explain how the Commission can issue an informed advisory opinion pursuant to section 3661(c) without knowledge of the potential changes in postal services accompanying the consolidation or closure of the proposed stations or branches.

**PR/USPS-3**

Footnote 1 on page 2 of the Request states that “the Postal Service has no basis for estimating the number or percentage of these stations and branches that may have their operations discontinued, or for quantifying the potential cumulative impact on the nature of any postal services that may be affected.”

- a. When (or at what stage of the Initiative) will the Postal Service have a basis for estimating the number or percentage of these stations and branches that may have their operations discontinued, or for quantifying the potential cumulative impact on the nature of any postal services that may be affected?
- b. In order to make a more informed advisory opinion, should the Commission refrain from issuing an advisory opinion under 3661(c) until the Postal Service has a basis for estimating the number or percentage of these stations and branches that may have their operations discontinued, or has a basis for quantifying the potential cumulative impact on the nature of any postal services that may be affected?
- c. If the Postal Service decides to close all branches and stations subject to the “initial focus” (as that term is used in the Request) of the Initiative, please identify, describe and provide all documents detailing the total cost savings and revenue loss from the closure of those branches and stations.
- d. If the Postal Service decides to close all postal retail facilities subject to the Initiative (including the “initial focus,” as that term is used in the Request, and subsequent stages), please identify, describe and provide all documents detailing the total cost savings and revenue loss from the closure of those branches and stations.
- e. If the Postal Service decides to close all postal retail facilities subject to the Initiative (including the “initial focus,” as that term is used in the Request, and subsequent stages), please identify, describe and provide all documents detailing the total number of branches and stations that would be closed.

**PR/USPS-4**

On page 6 of the Request, the Postal Service states that “[u]nder this centrally directed program, each of the 74 administrative District offices that help to manage the postal system is expected to review stations and branches in its geographic area of

responsibility and to submit operational consolidation proposals to Headquarters for review and approval.”

- a. Please describe, identify and provide all documents detailing the centrally directed program referenced above.
- b. In addition to USPS-LR-N2009-1/1 and USPS-LR-N2009-1/2, please describe, identify and provide all documents detailing the factors, elements and criteria to be used to review stations and branches for the submission of operational consolidation proposals to Headquarters for review and approval.
- c. Please describe, identify and provide all documents transmitted or to be transmitted to the District offices with respect to this Initiative.
- d. Please describe, identify and provide all documents detailing the differences between this Initiative and closings or consolidations of other branches or stations (closed or consolidated previously or otherwise) not subject to this “centrally directed program.”

#### **PR/USPS-5**

On page 4 of the Request, the Postal Service mentions that the “alternative retail access channels” are consistent with PAEA section 302(d). PAEA section 302(d) also states that “the Postal Service plan shall include plans to expand and market retail access to postal services in addition to post offices.

- a. Please explain how the Initiative is consistent with PAEA section 302(d).
- b. Please explain why the Postal Service does not believe that it would be better to undertake the Initiative as part of the broader statutorily required PAEA section 302 plan.

#### **PR/USPS-6**

Please refer to the Postal Service’s June 2009 “Station/Branch Optimization and Consolidation” briefing located at <http://www.apwu.org/news/webart/2009/09-076-consolidatingstations-090701-c-uspsbriefing.pdf>.

- a. Please provide a copy of the most updated version of this briefing and any other briefings relating to the Initiative.

- b. Page 7 of the briefing discusses the Postal Service's establishment of "District Team[s]." Page 9 of the briefing states that "success will depend on the effectiveness of district team." Please identify and describe the District Team and all members of the District Team and their roles and responsibilities with respect to the Initiative. Please also provide all documents relating to the District Teams.
  
- c. Page 8 of the briefing states that ROAM/FMS/FDB will be used to identify stations/branches for consolidation. Please explain and describe how ROAM/FMS/FDB will be used to identify stations/branches for consolidation. Please provide all documents dealing with how ROAM/FMS/FDB relates to the Initiative.