



**PR/USPS-T1-1**

Page 6 of your testimony and page 4 of the Request explain that the leading alternative to post offices, stations, and branches is the Internet at [www.usps.com](http://www.usps.com).

- a. Please identify and describe all postal products that a customer can purchase at a postal retail facility that a customer cannot purchase on [www.usps.com](http://www.usps.com).
- b. Please describe whether there are currently quantity restrictions on purchases on [www.usps.com](http://www.usps.com) that do not exist when purchased at a postal retail facility (e.g., the purchase of 1 or 17 stamps).
- c. When a customer requests postal products via the [www.usps.com](http://www.usps.com), what is the range (minimum to maximum) of time that a customer must wait to receive those stamps or other postal products from when the stamps or other postal products are ordered through the point in time in which they are delivered?
- d. Are there currently any minimum ordering requirements for postal products ordered via [www.usps.com](http://www.usps.com) (e.g., can a customer purchase one stamp online)? If so, please explain.
- e. Are there any shipping and/or handling charges associated with the purchase of stamps or other postal products ordered via [www.usps.com](http://www.usps.com)? If so, please describe these charges and provide all documents detailing these changes.
- f. Does the Postal Service accept the same methods of payment for delivery of stamps and other postal products ordered by via [www.usps.com](http://www.usps.com) as those methods accepted at postal retail facilities? If not, please describe the differences in payment types.
- g. Does the Postal Service offer via [www.usps.com](http://www.usps.com) the ability for a customer to print shipping labels (with postage paid) for the following mailpieces:
  1. Express Mail envelope.
  2. Express Mail package.
  3. Priority Mail envelope.
  4. Priority Mail package.

5. First-Class Mail letter.
  6. First-Class Mail flat.
  7. First-Class Mail parcel.
  8. Media Mail package.
  9. Parcel Post package.
- h. For each item in paragraph (g) of this interrogatory that the Postal Service answers in the negative, please explain why these services are not available via [www.usps.com](http://www.usps.com).

**PR/USPS-T1-2**

The Request at page 4 explains that “Carrier Pickup service allows customers to arrange for postal carriers to pickup outgoing packages and other mail at their homes or businesses.” Your testimony also discusses the fact that “many items that can be mailed at a postal retail window or deposited in a postal collection box can be mailed by a customer right at their home or office via Carrier Pickup service. USPS-T-1 at 7-8.

- a. Does the Postal Service allow free Carrier Pickup if the customer seeks to mail only First-Class parcels, letters, or flats? Please explain.
- b. Does the Postal Service allow free Carrier Pickup if the customer seeks to mail only Parcel Post mailpieces? Please explain.
- c. Does the Postal Service allow for customers to leave stamped postage weighing more than 13 ounces for Carrier Pickup? Please explain.

**PR/USPS-T1-3**

Your testimony discusses that in recent years Automated Postal Centers (APCs) have been installed in postal retail lobbies. USPS-T-1 at 7.

- a. If a customer’s closest branch or station currently has an APC, please explain how the potential closure of this branch or station is mitigated by the existence of that APC.
- b. Does the Postal Service plan on replacing customers’ branches or stations with APCs?

**PR/USPS-T1-4**

The Request at page 4 explains that “[s]tamps and other postal products can be ordered by mail or phone for delivery for a customer’s address.” With respect to these topics, your testimony states that “[p]ostal customers also continue to have the option of ordering stamps by mail,” and “[c]ustomers who make a toll-free telephone call to 1-800 ASK-USPS (275-8777) are able to obtain the same products and services that are available at [www.usps.com](http://www.usps.com), including mailing and shipping supplies and stamps.” USPS-T-1 at 7.

- a. Please identify and describe all “other postal products” as that term is used on page 4 of the Request.
- b. Please describe whether there are currently quantity restrictions on purchases made via mail or phone for home delivery that do not occur when purchased at a postal retail facility (e.g., the purchase of 1 or 17 stamps).
- c. When a customer requests “stamps or other postal products” by mail or phone, what is the range (minimum to maximum) of time that a customer must wait to receive those stamps or other postal products from when the stamps or other postal products are ordered through the point in time in which they are delivered?
- d. Are there currently any minimum ordering requirements for postal products ordered by mail or phone for delivery (e.g., can a customer purchase one stamp for home delivery)? If so, please explain.
- e. Are there any shipping and/or handling charges associated with the purchase of stamps or other postal products ordered by mail or phone? If so, please describe these charges and identify and provide all documents detailing these charges.
- f. Does the Postal Service accept the same methods of payment for delivery of stamps and other postal products ordered by mail or phone as those accepted at postal retail facilities? If not, please describe the differences in payment types.

**PR/USPS-T1-5**

Footnote 5 of your testimony notes that 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.” USPS-T-1 at 8 n.5.

- a. Please provide an estimated timeframe as to when this list will be filed.
- b. Please provide a list of all EAS-24 and above stations and branches.

**PR/USPS-T1-6**

On page 10 of your testimony, you state that “[s]tations and branches that report to EAS-24 and above Postmasters represent a substantial portion of the annual total operating expenses (including employee salaries and benefits, leasing costs and utilities) for the Postal Service. USPS-T-1 at 10.

- a. Please identify, describe and provide all documents detailing the portion and percentage of annual total operating expenses of all postal retail facilities.
- b. Please identify, describe and provide all documents detailing the portion and percentage of annual total operating expenses of stations and branches that report to EAS-24 and above Postmasters that are subject to the initial focus of this Initiative.
- c. Please identify, describe and provide all documents detailing the portion and percentage of annual total operating expenses of the total list of stations and branches.

**PR/USPS-T1-7**

On page 2 of the Request, the Postal Service states that it will examine branches and stations to identify opportunities for consolidation, “but only after concluding that such changes will continue to provide ‘ready access to essential postal services.’” Similarly, your testimony states that “[n]o facility will be consolidated unless a study demonstrates an opportunity for efficiency gains while maintaining ready access to adequate service.” USPS-T-1 at 11.

- a. Please identify, describe and provide all documents detailing what the Postal Service considers the factors, criteria and elements that constitute “ready access to essential postal services” and “ready access to adequate service” as those terms are used by the Postal Service.
- b. Please identify, describe and provide all documents detailing how the Postal Service weighs the factors, criteria and elements described in paragraph a to determine if areas will have “ready access to essential

- postal services” and “ready access to adequate service” as those terms are used by the Postal Service.
- c. Please define “opportunity for efficiency gains” as that term is used on page 11 of your testimony.
  - d. Please define “ready access to adequate service” as that term is used on page 11 of your testimony.

**PR/USPS-T1-8**

On page 8 of your testimony, you state that “more than a quarter of retail revenue is now generated through alternative access channels.” The Postal Service’s Request also states that “alternative retail access channels ... now account[] for more than 30 percent of retail revenue.” Request at 4. Please identify the universe of alternative retail access channels, and provide the percent of total retail revenue by alternative retail access channel and by type of transaction (such as stamp purchase, special services, etc.).