



**PR/USPS-T2-1**

Page 4 of your testimony states that the pre-Initiative station and branch discontinuance review process “starts with local initiation of a study at the direction of the District Manager in whose service area the station or branch in question is located.” Later, on pages 9-11 of your testimony, you discuss the proposed post-Initiative discontinuance study using slightly different phrasing. Are these two processes identical? If not, what changes does the Initiative bring to the discontinuance study part of the process? Please describe and provide all documents detailing these changes.

**PR/USPS-T2-2**

Page 4 of your testimony states that the current discontinuance review process begins with a study of the facilities’ business activity. It further states that such review “includes examination” of ten elements. USPS-T-2 at 4. You also mention that “factors unique to a particular facility must be considered.” *Id.* With the exception of the “unique factors,” is the list on lines 9-30 an exhaustive list of the examination of the facility’s business activities? If not, please provide a complete list of the elements or factors considered in the examination of the facilities’ business activities.

**PR/USPS-T2-3**

On page 7 of your testimony, you mention that it is expected that the number of discontinuance proposals may increase, “in response to a Headquarters initiative directing all Districts to conduct studies.” Please provide a copy of that directive and all other documents related to the Headquarters initiative referred to in the quote above.

**PR/USPS-T2-4**

In footnote 5 on page 7 of your testimony, you state that in “the Initiative addressed in this docket Headquarters identifies for field managers specific stations/branches to review.” Please explain how Headquarters “identifies” stations/branches for review (i.e., is Headquarters identifying a subset of certain “EAS-24 and above” stations or branches for field managers to review)?

**PR/USPS-T2-5**

Page 8 of your testimony states that the “pre-screening process relies upon such factors as....” Is the list on lines 7-31 an exhaustive list of the non-retail service issue factors relied upon for the prescreening process? If not, please provide a complete list of the non-retail service issue factors considered in the prescreening process.

**PR/USPS-T2-6**

Page 8 of your testimony states that the pre-screening considers the “following retail service issues.” Is the list on page 8, lines 33-38 through page 9, lines 1-3 an exhaustive list of the retail service issue factors relied upon for the prescreening process? If not, please provide a complete list of the retail service issue factors considered in the prescreening process.

**PR/USPS-T2-7**

Under the prescreening process, please identify who makes the decision as to whether a branch or station should be subject to a discontinuance study?

**PR/USPS-T2-8**

Please identify and provide all documents used and to be used by the Postal Service in the prescreening process described on pages 7-9 of your testimony.

**PR/USPS-T2-9**

On page 8 of your testimony, you state that “[p]rescreening is underway.”

- a. Please identify and provide all prescreening related documents detailing the stations and branches that have been prescreened as not “being considered for a discontinuance study in the near term” as you use that phrase on page 9 of your testimony.
- b. Please identify and provide all prescreening related documents detailing the stations and branches that have been prescreened as “being considered for a discontinuance study in the near term” as you use that phrase on page 9 of your testimony.
- c. Please identify and provide all prescreening related documents detailing the stations and branches that have begun but have not yet completed the prescreening process.

**PR/USPS-T2-10**

On page 8 of your testimony, you state that the “pre-screening activity consists of identifying such stations and branches in the District’s service area to prioritize consolidation opportunities for study.”

- a. Please identify, describe and provide all documents detailing how branches and stations are “prioritize[d],” as used in your testimony.
- b. Are stations and branches ranked in order of priority? If so, please provide a list and all documents detailing the current state of these rankings.
- c. Please explain how stations and branches are “prioritize[d]” as you use the term on page 8 of your testimony.

**PR/USPS-T2-11**

On page 12 of your testimony in Table 2, you set forth the timeline for the discontinuance study process for branches and stations.

- a. In making a determination whether or not to close or consolidate a particular branch or station, is the Postal Service considering the following:
  1. the effect of such closing or consolidation on the community served by such station or branch.
  2. the effect of such closing or consolidation on employees of the Postal Service employed at such office.
  3. whether such closing or consolidation is consistent with the policy of the Government that the Postal Service shall provide a maximum degree of effective and regular postal services to rural areas, communities, and small towns where post offices are not self-sustaining.
  4. the economic savings to the Postal Service from such closing or consolidation.
  5. such other factors as the Postal Service determines are necessary.
- b. Prior to making a determination as to the necessity for the closing or consolidation of any branch or station, is the Postal Service providing adequate notice of its intention to close or consolidate such branch or station at least 60 days prior to the proposed date of such closing or consolidation to persons served by such branch or station to ensure that such persons will have an opportunity to present their views?
- c. Will any Postal Service notice for the closing or consolidation of a branch or station include a provision stating that, pursuant to Pub.L. 94-421, a

final Postal Service determination to close or consolidate a post office may be appealed to the Postal Regulatory Commission at 901 New York Avenue NW, Suite 200, Washington, D.C. 20268-0001, within 30 days after the issuance of a written determination by the Postal Service?

- d. Will any determination of the Postal Service to close or consolidate a branch or station be in writing?
- e. Will any determination of the Postal Service to close or consolidate a branch or station include the findings of the Postal Service with respect to the considerations listed in paragraph (a)(1) through (a)(5) of this interrogatory?
- f. Will any determination and findings of the Postal Service to close or consolidate a branch or station be made available to persons served by such branch or station?
- g. Will the Postal Service not take any action to close or consolidate a branch or station office until 60 days after any written determination is made available to persons served by such branch or station?
- h. If any of your answers to paragraphs (a) through (g) are negative, please explain how the Postal Service's Initiative is consistent with the Commission's longstanding interpretation of the term "post office" (as used in 39 U.S.C. 404(d)) as a fixed retail facility serving the public and acting as the point of origin for delivery routes (most recently reaffirmed by the Commission acting as an appellate body and remanding to the Postal Service for further consideration its improper closing of Observatory Finance Station in Docket No. A2006-1).
- i. If the Postal Service plans on closing or consolidating a community post office or contract postal unit, will it follow the procedures listed in paragraphs (a) through (g) of this interrogatory? If not, please explain.
- j. If the Postal Service plans on closing or consolidating an Automated Postal Center, will it follow the procedures listed in paragraphs (a) through (g) of this interrogatory? If not, please explain.
- k. If the Postal Service plans on closing or consolidating a location that sells stamps on consignment, will it follow the procedures listed in paragraphs (a) through (g) of this interrogatory? If not, please explain.

- I. If the Postal Service's responses to paragraphs (i), (j), or (k) are in the negative, please identify and explain the closing or consolidation procedures that the Postal Service will follow for each of the locations identified in paragraphs (i), (j), and (k). Please provide all documents relating to those closing or consolidation procedures.

**PR/USPS-T2-12**

Please refer to page 7 of your testimony where you discuss the Initiative and the prescreening process. Please explain the relationship of the prescreening process to the Initiative.

**PR/USPS-T2-13**

Please refer to page 7 of your testimony where you discuss the prescreening process. Pursuant to the prescreening process, please provide the following:

- a. The number of stations and branches under review.
- b. The number of stations and branches submitted by each District to Headquarters.
- c. The number of stations and branches submitted by each District that have been approved by Headquarters for consolidation or closure.