

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

STATION AND BRANCH OPTIMIZATION AND
CONSOLIDATION INITIATIVE, 2009

DOCKET NO. N2009-1

INTERROGATORIES OF DAVID B. POPKIN TO THE UNITED STATES POSTAL
SERVICE [DBP/USPS-1 through 29]

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. To the extent that a reference is made in the response to a Library Reference, I would appreciate receiving a copy of the reference since I am located at a distance from Washington, DC. 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."

July 13, 2009

Respectfully submitted,

N20091A1

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

DBP/USPS-1 Does the Postal Service believe that an Automated Postal Center ["APC"] serves as a replacement for services provided at a retail window of a post office. Please explain your response.

DBP/USPS-2 [a] Please provide data which will show the number of APCs that were in service in each of the years since they were deployed.

[b] Please provide an indication of the planned increase or decrease in the future deployment of APCs and discuss your response.

DBP/USPS-3 Please provide an approximate percentage of APCs that are located in other than a post office. Please list the type of facility that they are located in along with an approximate number of units in each of the listed categories.

DBP/USPS-4 [a] Please provide a listing of the services that a customer may obtain equally as well at an APC vs a full service retail window.

[b] Please provide a listing of the services that a customer may obtain more easily at a full service retail window than at an APC.

[c] Please provide a listing of the services that a customer may obtain at a full service retail window and may not obtain at an APC.

[d] Please provide a listing of the services that a customer may obtain more easily at an APC than at a full service retail window.

[e] Please provide a listing of the services that a customer may obtain at an APC and may not obtain at a full service retail window.

[f] Please provide a listing of the new services that are proposed for APCs and the approximate date of implementation.

DBP/USPS-5 Please confirm, or explain if you are unable to confirm, that presently many post offices and classified stations and branches provide the facilities of Business Mail Entry Units ["BMEU"] for the acceptance of permit imprint and presorted/bulk mail from mailers.

DBP/USPS-6 Please confirm, or explain if you are unable to confirm, that there is a program implemented or proposed to be implemented in part or all of Delaware, New Jersey, and Florida to consolidate the functions of a BMEU to a limited number of facilities. Please provide details of these consolidations including the results of the program and plans to reverse or expand the program.

DBP/USPS-7 Please confirm, or explain if you are unable to confirm, that the consolidations of the functions of a BMEU to a limited number of facilities will affect users of this service in ways such as requiring longer trips, waiting longer for the

service, changing the hours of acceptance, and affecting the delivery standards of the mail.

DBP/USPS-8 [a] Does Attachment A to USPS-T-1 provide a listing of all offices in the country that are Level 24 or higher?

[b] If not, please advise the names of the missing facilities and explain why they are not shown on the list.

DBP/USPS-9 For each level of the Postmaster, please provide a listing of the breakdown of the number of post offices and number of subordinate stations and branches in that level.

DBP/USPS-10 Please describe in detail how the level of the Postmaster is determined including the specifics of the values that go into ranking a post office at Level 24 or higher.

DBP/USPS-11 Please describe in detail why the cutoff level for this evaluation was chosen at Level 24 as opposed to a higher or lower level.

DBP/USPS-12 Please confirm, or explain if you are unable to confirm, that the only differences between the public and non-public versions of the two Library References are the redactions which a member of the public may determine by the black redaction box on their copy.

DBP/USPS-13 Two facilities were chosen to provide a detailed evaluation of that facility for the preparation of the Library Reference for this proceeding.

[a] How many similar evaluations have been made of other stations and branches of Level 24 and higher offices?

[b] Please explain why the two specific facilities were chosen for the Library References.

DBP/USPS-14 Please explain why the Postal Service believes that the Washburn, Iowa, branch with its 22 delivery points, a daily incoming mail volume of 152.4 mail pieces, and a daily outgoing mail volume of 66.78 mail pieces is representative of a typical Level 24 station or branch.

DBP/USPS-15 Please explain why the Washburn, Iowa, branch

[a] does not have mail delivery on Saturday

[b] does not have a 5 PM or later weekday collection at the blue collection box in front of the post office

[c] does not have a Saturday collection [1 PM or later] at the blue collection box in front of the post office.

DBP/USPS-16 Please advise the effects that the closing of a station or branch of a Level 24 or higher post office will have of the changing of the address of a delivery customer who receives

[a] post office box delivery

[b] city delivery

[c] rural delivery

[d] HCR delivery.

Please indicate the conditions that would require vs. not require a change of address.

DBP/USPS-17 [a] Will the Postal Service make every effort to minimize the possibility of an address change following the closing of a branch or station of a Level 24 post office?

[b] If not, why not?

DBP/USPS-18 Please describe the effects that the Postal Service believes it will have on customers who are required to change their address as a result of closing of a branch or station of a Level 24 or higher post office. Please provide separate responses for different types of customers.

DBP/USPS-19 If a change of address is required following the closing of a branch or station of a Level 24 or higher post office,

[a] how long will a customer have before requiring the change?

[b] What will happen to mail sent to the old address after the time specified in response to subpart a?

[c] Will mail be delayed if it is sent to the old address between the implementation date and the final cutoff date?

[d] What assistance, including financial assistance, will the Postal Service provide to the customer to change stationery, address labels, signs, etc. as well as notifying correspondents of the change?

DBP/USPS-20 [a] Have all stations and branches of all Level 24 or higher post offices been evaluated for possible discontinuance?

[b] If not, why not?

[c] Has the main office of all Level 24 or higher post offices been evaluated for possible discontinuance?

[d] If not, why not?

DBP/USPS-21 Please advise the criteria that was provided and/or utilized to remove a facility from being considered for discontinuance.

DBP/USPS-22 Please advise what plans are being considered for evaluating changes in post offices that are below Level 24.

DBP/USPS-23 [a] Please confirm, or explain if you are unable to confirm, that various delivery carriers will collect various classes of mail while making deliveries along their routes and bring this mail back to their office for dispatch.

[b] Please also confirm, or explain if you are unable to confirm, that the discontinuance of a branch or station of a Level 24 or higher post office could increase the use made of this service.

DBP/USPS-24 Please confirm, or explain if you are unable to confirm, that there are three types of carriers that deliver mail along routes operating out of various post offices, namely City Delivery, Rural Delivery, and Highway Contract Delivery.

DBP/USPS-25 [a] Please provide a listing of the types and classes of mail that a carrier may collect from customers along their route.

[b] Please provide a listing of the types and classes of mail that a carrier may not collect from customers along their route.

[c] Please provide a listing of other services, such as selling stamps or purchasing money orders, that carriers may provide for customers along their route.

[d] If there is a fee for any of these services, please advise the amount and conditions.

If necessary, make a distinction between the different types of carriers and/or the requirements for aviation security.

DBP/USPS-26 Please advise the types, method of securing, and fee if any of mail pick-ups that may be arranged by a customer other than those performed by the delivery carrier at the time of making the delivery to the customer.

DBP/USPS-27 Please advise the various methods by which the customer can interact with the carrier to turn over their outgoing mail. Please make distinctions, if any, based on the type of carrier, the type of delivery [door or curbside], the type of mail, the size and weight of the mail.

DBP/USPS-28 Please confirm, or explain if you are unable to confirm, that all outgoing mail which a carrier collects while delivering mail along their route or which an employee picks-up in response to a request for a pick-up will be processed and dispatched to the Processing Center on the same day, including Saturday, that it is collected or picked-up from the customer and will receive the same delivery standards for that day being Day 0. If necessary, make any distinctions based on the type of mail or type of carrier.

DBP/USPS-29 With respect to Express Mail which a carrier collects while delivering mail along their route or which an employee picks-up in response to a request for a pick-up, please advise whether the time of receipt for purposes of determining the guaranteed delivery date and time will be the time the mail is turned over to the carrier or the time it is processed when the carrier returns to the office.