

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

STATION AND BRANCH OPTIMIZATION AND
CONSOLIDATION INITIATIVE, 2009

Docket No. N2009-1

OBJECTIONS OF THE UNITED STATES POSTAL SERVICE TO
POPKIN INTERROGATORIES
DBP/USPS-6, 9-10, 15, 28-29
(July 23, 2009)

In accordance with Rule 26(c) of the Postal Regulatory Commission's Rules of Practice and Procedure, the United States Postal Service hereby files the following objections to the interrogatories below submitted by the David Popkin on July 13, 2009.

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.

The Postal Service objects to answering this interrogatory because it seeks information that is irrelevant to the issues raised by the request in this proceeding. The Postal Service has requested that the Postal Regulatory Commission 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, within the meaning of 39 U.S.C. § 3661(b). Request at 1.

The Postal Service concedes that some retail stations and branches subject to

the Station and Branch Optimization and Consolidation Initiative may have Bulk Mail Entry Unit (BMEU) operations, and that a decision to consolidate stations or branches may result in elimination or relocation of BMEU function. Such potential changes will be addressed on a case-by-case basis as facility-specific station or branch discontinuance studies are performed as part of the Initiative. As indicated in the request in this proceeding, no such changes will be implemented before October 2009.

Otherwise, adjustments in BMEU functions are a routine management function initiated and implemented at the local level without involvement by Headquarters or as part of any centrally-directed initiative. This interrogatory alludes to isolated consolidations in BMEU functions that allegedly have been or will be implemented at unspecified postal facilities in three states. By definition, they are not part of the Station and Branch Optimization and Consolidation Initiative and, therefore, are outside the scope of this docket. Likewise, it is irrelevant to this docket whether the Postal Service may one day seek to initiate a nationwide BMEU consolidation program, or some other change in postal services.

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.

The Postal Service objects to answering these interrogatories because they seek information that is irrelevant and outside the scope of this docket. The goal of the Initiative is to determine whether optimization of how retail services are provided to customers requires continued operation of all current stations or branches that report to Post Offices managed by Executive & Administrative Schedule (EAS) pay grade level 24 and above Postmasters. (USPS-T-2 at 2). The Postal Service chose to start the Station and Branch Optimization and Consolidation Initiative (“Initiative”) with these stations and branches because they 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 question about every level of Postmaster, and the breakdown of the number of post offices and number of subordinate stations and branches in that level, is beyond the scope and not relevant to this proceeding. As stated in Witness VanGorder’s testimony (USPS-T-1 at *fn.5*), the Postal Service is presently compiling a list that is expected to identify specific candidate station and branches that are part of the study, and intends to file a copy with the Commission as soon as possible.

Mr. Popkin’s request for the Postal Service to describe, in detail, how the level of the Postmaster is determined and the ranking of post offices, is similarly irrelevant. The purpose of the Initiative to study a group of stations and branches to see whether they can be optimized or consolidated. The list of stations and branches which will be studied will be provided. The level 24 designation is used simply because most of these stations and branches are within this level, but if another identifier could have been used, it would have been used. The point of this proceeding is not to have a discussion

of the different levels of Postmasters or the ranking of post offices, but to determine whether a plan to optimize the postal retail network by consolidating the operations of a specified category of retail stations and branches into nearby facilities constitutes a substantially nationwide change in the nature of postal services, within the meaning of 39 U.S.C. § 3661(b).

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.

This interrogatory refers to the Washburn, Iowa postal branch (identified in Library Reference N2009-1/2) and asks a list of specific questions about the operations of that branch. The Postal Service objects to providing the requested information. It is irrelevant to the issues raised by the request in this proceeding. Library Reference N2009-1/2 was filed for the purpose of providing an example of the mechanics of the long-standing discontinuance decision-making process that the Postal Service applies to stations and branches, and that will be applied as part of the Initiative being reviewed in this docket. Neither the operations of the Washburn branch (which are currently scheduled to discontinue on July 31, 2009) nor the merits of that discontinuance decision are being reviewed in this docket. Accordingly, questions regarding that

branch are irrelevant.

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.

The Postal Service objects to answering these interrogatories because they seek information irrelevant to this docket. This proceeding concerns the Postal Service's request that the Postal Regulatory Commission 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, within the meaning of 39 U.S.C. § 3661(b). Request at 1. Customers have the option today of giving their outgoing mail to a carrier. The Station

and Branch Optimization and Consolidation Initiative will not change that option. The policies and practices concerning processing and dispatch of mail collected by carriers on their deliver routes are unaffected by whether any stations and/or branches are discontinued.

Moreover, these questions have been asked and answered in previous omnibus rate case dockets and in response to recent Freedom of Information Act requests by Mr. Popkin. The mere availability of discovery in a pending Commission docket (to which the requested information is irrelevant) is an insufficient basis for seeking the same answers again.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux
Chief Counsel, Pricing and Product Support

Sheela Portonovo

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-3012; Fax -5402
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