

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268B0001

STATION AND BRANCH OPTIMIZATION AND
CONSOLIDATION INITIATIVE, 2009

Docket No. N2009-1

RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO PUBLIC REPRESENTATIVE INTERROGATORIES PR/USPS-T1-7(a-b)
REDIRECTED FROM WITNESS VANGORDER
(July 27, 2009)

The United States Postal Service hereby provides an institutional response to the following interrogatories of Public Representative Sidman directed to witness VanGorder and filed on July 10, 2009: PR/USPS-T1-7(a-b). The interrogatories are stated verbatim and followed by the responses. Responses to PR/USPS-T1-7(c-d) are being provided by witness VanGorder.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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**RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
PUBLIC REPRESENTATIVE INTERROGATORY
REDIRECTED FROM WITNES VANGORDER**

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.

RESPONSE

- a-b. Section 403 of title 39, United States Code establishes general duties associated with the provision of “adequate” postal services and “ready access” to essential services, and grants postal management broad discretion in the performance of those duties. The statute does not specify any factors, criteria or elements to consider in the execution of these duties beyond an emphasis on efficiency and the avoidance of undue or unreasonable discrimination or preference.
- b. Each District review team uses the long-standing station/branch discontinuance process to evaluate the availability of access to postal

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RESPONSE TO PR/USPS-T1-7 (continued)

services through various postal retail and alternative channels that would remain if a particular retail postal station or branch in the service area of a particular Post Office were to be discontinued. There is no one-size-fits-all formula or cookie-cutter approach for determining the degree to which access to postal services would be affected if a particular station or branch in a Post Office service area were consolidated. What constitutes “adequate” service or “ready access” to services may vary from one Post Office service area to another. The District review team applies its expert judgment to the facts on the ground in each case. A principal objective of the current Initiative is to improve efficiency. The station/branch discontinuance review process explicitly considers local customers’ needs, provides a rational basis for postal management decision-making, with the objective of avoiding discrimination of the sort frowned upon by section 403.

c-d. [Responses provided by witness VanGorder]