

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 DAVID POPKIN INTERROGATORIES DBP/USPS-1-9 AND 11-27  
(July 27, 2009)

The United States Postal Service hereby provides responses to the following institutional interrogatories of David Popkin dated July 13, 2009: DBP/USPS-1 through 9 and 11 through 27. Each interrogatory is stated verbatim and followed by the response. Full or partial objections were filed on July 23, 2009, to DBP/USPS-5, 6, 9, 10, 15, 28 and 29.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID POPKIN**

**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.

**RESPONSE**

The Automated Postal Center (APC) serves as a replacement for a subset of services provided at a retail window. Ease of use, 24/7 availability, and convenience attract customers who are seeking the services provided by the APC. The APC does not offer the full range of products and service offered at the retail window. See the response to PR/USPS-T1-1(a).

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**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.

**RESPONSE**

a. 2004 – 2500 (Initial deployment)

2005 – 2498

2006 –2497

2007 –2496

2008 –2494

2009 – 2493

\* No additional deployment has occurred since initial deployment, reduction is due to damage from natural disasters, and other incidents.

b. There is no plan to increase the number of APCs presently deployed.

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**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.

**RESPONSE**

9 APCs (0.36 percent) are located in 8 non traditional retail locations. 7 of these are located in 6 unmanned postal facilities. 2 are located in postal-staffed retail units in grocery stores.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
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**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.

**RESPONSE**

- (a)-(e). See the response to PR/USPS-T1-1(a).
- (f). No new products or services are proposed.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
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**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.

**RESPONSE**

Confirmed...

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
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**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.

**RESPONSE**

A partial objection was filed in response to this interrogatory.

Isolated local determinations to relocate or consolidate a BMEU operation do not constitute evidence of a Headquarters or Area “program” focused on that objective. It is possible that the consolidation of stations and branches as a part of the Station and Branch Initiative may result in some BMEU functions being consolidated. That would be a consequence of the Initiative, not an objective.

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**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.

**RESPONSE**

While such outcomes are possible, it is also the case that the closure of a BMEU could result in customers obtaining service at locations that are an equal or shorter distance from their origins, that have shorter lines, a greater ability to provide service, more parking, more convenient hours, and that the change could have no adverse impact on transit times.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
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**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.

**RESPONSE**

(a) No. It is a list of cities.

(b) There are no facilities missing on the list that was not intended to include them.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
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**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.

**RESPONSE**

Objection filed.

This Initiative is focused on stations and branches that report to EAS-24 and above Postmasters. As indicated in various documents filed thus far, a list reflecting the number of such stations and branches in being developed and will be filed in this docket.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
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**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.

**RESPONSE**

EAS-24 and above Postmasters generally have responsibility for operations in urban and suburban areas that are likely to have larger stations and branches, and greater density of stations and branches, some of which are in very close physical proximity to each other. . There tends to be more access to alternative postal retail channels and higher utilization of Internet access in these areas.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
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**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.

**RESPONSE**

That was the intent.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
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**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.

**RESPONSE**

(a) In the past five years, any such similar evaluations of would be a subset of the number represented in the Table on page 6 of USPS-T-2.

(b) As witness Matalik was preparing her testimony, it was decided that it might help to illuminate the station/branch discontinuance process discussed by providing actual examples of the application of the process. Two recently completed discontinuance decision packages were handily available atop a nearby file cabinet. They were anointed as Library References.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
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**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.

**RESPONSE**

Please cite where the Postal Service ever expressed such a belief. Alternatively, please refer to the response to DBP/USPS-13(b).

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
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**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.

**RESPONSE**

An objection to this interrogatory was filed.

Without waiving that objection, the Postal Service incorporates by reference its response to DBP/USPS-13(b) and emphasizes that the Washburn, IA Classified Station is scheduled for closure effective July 31, 2009.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
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**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.

**RESPONSE**

No change of address will occur for scenarios (a), (c) and (d). For Post Offices, there is a potential for address changes. Please see USPS-T-1, pages 12-13.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
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**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?

**RESPONSE**

(a) The Postal Service expects that it will make every reasonable effort.

(b) See the response to subpart (a).

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
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**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.

**RESPONSE**

Please see the response to DBP/USPS-16.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
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**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?

**RESPONSE**

(a) Twelve months.

(b) It will be returned to sender with information containing the forwarding address.

(c) No.

(d) None.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
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**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?

**RESPONSE**

- (a) See USPS-T-1, pages 8-9
- (b) See answer to [a] above.
- (c) No.
- (d) Post Offices are outside the scope of this Initiative.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
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**DBP/USPS-21**

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

**RESPONSE**

Please refer to USPS-T-1, page 8.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
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**DBP/USPS-22**

Please advise what plans are being considered for evaluating changes in post offices that are below Level 24.

**RESPONSE**

See the response to DBP/USPS-20(d).

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
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**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.

**RESPONSE**

(a) Confirmed.

(b) Confirmed that the discontinuance of a branch or station of a Level 24 or higher post office either may or may not increase the use made of this service.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
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**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.

**RESPONSE**

Confirmed.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
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**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.

**RESPONSE**

(a) Carriers may collect properly prepared mail bearing full single-piece rate postage of all types and classes.

(b) Carriers should not accept mail if it would seriously interfere with scheduled deliveries or collections. Carriers should not collect mail that requires deposit at specific locations, such as presorted mail; carriers should not collect mail that is identified as not properly prepared or not bearing correct postage; carriers should not collect mail identified as nonmailable hazmat; and carriers should not collect mail weighing 13 ounces or more with postage paid only by postage stamps.

(c) Rural carriers provide postal services to the addresses served by their route, including stamp sales and purchase of money orders. Highway Contract Route carriers with box deliveries (not HCR drivers only transporting mail between postal facilities) also provide this service.

(d) The prices for products and services obtained through a Rural or HCR carrier with box deliveries are the same as if purchased at a retail window.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
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**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.

**RESPONSE**

Pickup On Demand<sup>©</sup> is available for a fee of \$15.30, regardless of the number of packages. Service is available for Express Mail<sup>®</sup>, Priority Mail<sup>®</sup>, Global Express Guaranteed<sup>®</sup> or Package Services.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
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**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.

**RESPONSE**

There are numerous methods that customers and carriers can use to interact, and any list may not be complete. Customers can hand mail to carriers; mail can be left at the delivery receptacle for pickup by the carrier; and curbside mail receptacles have a flag specifically to indicate that outgoing mail is in the delivery receptacle. As noted in response to DBP/USPS-25(b), certain types of mail should not be turned over to the carrier. The size and weight of mail may affect the carrier's ability to pick it up.