

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

STATION AND BRANCH OPTIMIZATION AND
CONSOLIDATION INITIATIVE, 2009

Docket No. N2009-1

OBJECTION OF THE UNITED STATES POSTAL SERVICE TO
DAVID POPKIN INTERROGATORY DBP/USPS-31
(July 27, 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 objection to the interrogatory below submitted by David Popkin on July 17, 2009.

DBP/USPS-31

It would appear that the Postal Service has either instituted or is considering institution of summer hours for retail window service hours. This would result in the reduction of retail window service hours and/or lobby access hours at some post offices, including stations and branches of some post offices, during the summer time frame and perhaps beyond.

Please furnish details of any such programs that have been or are being planned at the Area level or above. Please also furnish copies of any memoranda or directives that have been issued at the Area level or above which are related to the temporary or permanent reduction in retail window service hours and/or lobby access hours.

The Postal Service objects to this interrogatory because it seeks information that will not lead to admissible evidence relevant to the issues raised by the request in this docket. The Initiative under review concerns whether retail service at a subset of a particular category of stations and branches will be discontinued. The Initiative has no bearing on the daily operating hours of such stations and branches, or any policies or practices related to temporary or seasonal changes in daily operating hours.

The fact that the Initiative in this docket relates to an aspect of postal retail operations and is undergoing Commission review does not establish a pretext for inquiring about every other imaginable aspect of postal retail operations. Otherwise, this interrogatory might as well read as follows:

Please furnish details and copies of all memoranda or directives issued at the Area level or above which relate to any permanent or temporary changes in retail operations that have been or are being planned and that are outside the scope of the Initiative under review in this docket.

The Postal Service has requested the Commission's opinion on the nature of service changes that may result from the consolidation of retail facilities, irrespective of whether retail services are available at those facilities for 4, 14 or 24 hours a day . It is the hope of the Postal Service that this objection helps to sharpen the focus of all parties on the issues relevant to the request in this docket, so that the limited resources of the Postal Service and the Commission can be dedicated to the purposes of 39 U.S.C. § 3661 as they relate to that request.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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