

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

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**Station and Branch Optimization and  
Consolidation Initiative, 2009**

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**Docket No. N2009-1**

**INTERROGATORIES OF THE AMERICAN POSTAL WORKERS UNION, AFL-CIO  
TO USPS WITNESS KIMBERLY I. MATALIK  
(APWU/USPS-T2-1-9)  
(July 28, 2009)**

Pursuant to Rules 25 through 28 of the Rules of Practice, American Postal Workers Union, AFL-CIO directs the following interrogatories to United States Postal Service witness Kimberly I. Matalik (USPS-T-2). If the witness is unable to respond to any interrogatory, APWU requests that a response be provided by an appropriate person capable of providing an answer.

As used in these interrogatories, the terms listed below are defined as follows:

The term "document" means all writings of any kind, including the originals and all copies, whether different from the originals by reason of any notations made on such copies or otherwise (including without limitation correspondence, memoranda, notes, diaries, statistics, letters, telegrams, minutes, contracts, reports, studies, summaries, pamphlets, books, interoffice and intraoffice communications, offers, notations of any sort of conversations such as telephone calls, meetings or other communications, bulletins, computer printouts, teletypes, telefaxes, worksheets, and all drafts, alterations, modifications changes and amendments of any kind to the foregoing); graphic or oral records or representations of any kind (including without limitation photographs, charts, graphs, microfiche, microfilm, videotape recordings, motion pictures); and electronic, mechanical or electrical records or representations of any kind (including without limitation e-mails, computer files, tapes, cassettes, discs, recordings).

The term "all documents" means every document as above defined known to

USPS and every such document which can be located or discovered by reasonably diligent efforts.

The term "Postal Service" includes all agents, employees, attorneys, representatives, and anyone acting on its behalf, as well as the Board of Governors, contractors and subcontractors to the Postal Service, and the Postal Service Office of Inspector General (OIG).

The term "person" means any natural person, corporation, partnership, proprietorship, association, organization or group of natural individuals.

The term "identify," when used with regard to a person means to provide the full name, position, address and telephone number of the person.

The term "identify," when used with regard to a document means to describe the subject matter of the document, its author, its date and any addressee.

For each interrogatory response, identify all individuals responsible for providing the response who will be able to confirm the response under oath.

For any objection to or other refusal to answer any portion of any interrogatory, provide all information requested by that portion of the request to which there is no objection, or which an answer is not refused. If an objection is made to an interrogatory on the ground that it is too broad, provide all information determined by USPS to be discoverable. If an objection is made to an interrogatory on the ground that to provide the requested discovery would constitute an undue burden, provide all requested documents that can be supplied without undertaking what is claimed an undue burden. For those portions of any interrogatory to which an objection is raised, or which a complete answer is otherwise refused, state each reason for the objection or declination. If an objection is made to any portion of any interrogatory on the ground that it seeks privileged or otherwise non-discoverable information, state the privilege or other protection asserted, identify all persons to whom the document that is claimed to be non-discoverable have been communicated or displayed, and identify all documents that constitute, contain or reflect such information; and provide a separate list of all asserted privileged documents that identifies the author, recipient date and general subject matter of each document.

In any instance where a response to an interrogatory cannot be provided in full, so state and then respond to that portion of the interrogatory to which USPS can respond.

You should supplement the responses to answers to these interrogatories in accordance with the provisions of Rule 26(e) of the Federal Rules of Civil Procedure.

Respectfully submitted,

Darryl J. Anderson  
Jennifer L. Wood  
Counsel for American Postal Workers Union, AFL-CIO

APWU/USPS-T2-1 On page 4 you indicate that the station and branch discontinuance review process starts with local initiation of a study at the direction of the District Manager. On page 7 (at 13) of your testimony you state that in response to a Headquarters initiative directing all Districts to conduct studies of respective facilities it might be expected that a larger number of review processes could be started. On page 7 (at 19) you indicate that Headquarters has established a pre-screening process by which specific stations/branches are nominated for immediate field examination.

- a.) Was the list that will be provided to the Commission stating the specific facilities under consideration for consolidation generated at Headquarters or at the District level?
- b.) When you state that specific stations/branches have been nominated for immediate field examination, does that mean that the formal discontinuance review process has started for all these facilities or they have been nominated for decision as to whether they are to be placed on the prescreening list?
- c.) Of the several hundred discontinuance reviews of stations and branches taking place now, how many of those are in direct response to this initiative? Are these all following the formal discontinuance process or are some of these still part of the prescreening process?

APWU/USPS-T2-2 On Page 5 of your testimony you indicate that customer comment is obtained through either a public meeting or in response to a customer questionnaire.

- a.) How it is decided that a public meeting will be held? What personnel are involved in deciding to conduct a public meeting?
- b.) If a public meeting is conducted, what Postal Service personnel attend? Who runs the public meeting?
- c.) If a public meeting is held, how far in advance of the meeting is notice provided?
- d.) Please provide a copy of a notice of the public meeting that has been utilized by the Postal Service when reviewing a station or branch for closure or consolidation.
- e.) How is notice given to the public? Are notices mailed to residential postal customers? Are notices mailed to business customers?
- f.) Are public outlets, including newspapers, radio stations, etc.. provided with a copy of the notice of the public meeting?

- g.) Please provide a copy of all slides, hand-outs or other documents and materials used by the Postal Service during the public meetings.
- h.) If a questionnaire is used, when are the questionnaires sent out in relation to when responses are needed, e.g. one month, two weeks?
- i.) Are questionnaires tailored to inquire about local circumstances and conditions or are the same questionnaires used for all facility consolidation or closure studies?

APWU/USPS-T2-3 On page 7, Table 1 of your testimony you provide the number of station and branch closures during the past four fiscal years.

- a.) Please provide the number of discontinuance review studies that were performed on station and branches each year during FY2005-FY2008.
- b.) Please provide the number of consolidation review studies that were performed on station and branches each year during FY2005-FY2008. How many of these studies resulted in a consolidation?
- c.) You specifically state in footnote 4 that not all of the facilities in this group would be classified as facilities that report to EAS-24 (and above) Postmasters. Please provide a count of the studies done during this time period of facilities that report to EAS-24 (and above) Postmasters and the number of closures of facilities in this group.
- d.) The response to DBP/USPS-13 indicates that the Library References USPS-LR-N2009-1/1 and USPS-LR-N2009-1/2 were chosen because they were conveniently on top of a nearby filing cabinet. Would either of the facilities in the library references be an example of the facilities that are being considered for consolidation in this case?
- e.) If neither are representative of the type of facilities in this case, would you consider the issues addressed in these two library references as being indicative of the issues that will be in the type of consolidations being considered in this case?

APWU/USPS-T2-4 On Page 7 of your testimony you indicate the District recommends to Headquarters either a "discontinuance or consolidation of retail services at a location." Are these the only two possible recommendations that can be made?

- a.) Does the District or Headquarters ever consider partial closings and consolidations?

- b.) Are reports of operational changes, including closing on certain days, during lunch periods, reducing operating hours, etc., produced and considered by a District in making its recommendation to Headquarters? If not, why not.

APWU/USPS-T2-5 In your testimony you state that the discontinuance studies are a part of a "bottom-up" process initiated by Districts. What, if any, baselines or other guiding information is provided to the Districts to inform their decision to conduct a discontinuance study or not?

APWU/USPS-T2-6 During the "prescreening process" is public comment solicited? If so, how is it solicited? Please provide a copy of all documents and templates used to solicit public comment.

APWU/USPS-T2-7 Please provide a complete listing of all the documents that are included in the "decision package" submitted to Headquarters. Is this a standard document package? Please provide samples of all of the documents included in the "decision package."

APWU/USPS-T2-8 For each of the station and branch closures FY2005-FY2008 reported to the PRC in this docket, state whether or not a Contract Postal Unit (CPU) existed in the area served by the station or branch and, where such a CPU did exist, provide a copy of the contract for the period in which the station or branch closed.

APWU/USPS-T2-9 In your response to PR/USPS-T2-9, you indicate that the District Offices are prescreening and that stations that are "teed up" for study one week might be taken off the list the following week. Can you please describe

- a.) the type and time frame of the data that is being used to make the analysis;
- b.) any models that were used in making the list;
- c.) assumptions about future mail volume that were used in these evaluations;
- d.) the process of feedback between Headquarters and the District level that is being used to fine-tune the list;
- e.) the factors that determine if a station that has been "teed up" stays on the list or not.