Postal Regulatory Commission
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BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268–0001

STATION ANS BRANCH OPTIMIZATION AND CONSOLIDATION INITIATIVE, 2009	Docket No. N2009-1

OBJECTIONS OF THE UNITED STATES POSTAL SERVICE TO
PUBLIC REPRESENTATIVE INTERROGATORIES
PR/USPS-T1-9(c-d) AND 10(b-c) DIRECTED TO WITNESS VANGORDER
(July 30, 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 Public Representative on July 20, 2009.

PR/USPS-T1-9

(c) Please describe the current procedures for changing the hours of operation at stations and branches. Please provide all documents discussing such procedures.

(d) Please describe any changes in the procedures for changing the hours of operation at stations and branches as a result of the Initiative or otherwise implemented in the past two years or to be initiated in the next year. Please provide all documents discussing such changes in procedures.

The Postal Service invites the Commission's attention to the responses of witness VanGorder to PR/USPS-T1-9(a-b). The factual representations in those responses establish that subsections (c-d) seek information that will not lead to admissible evidence relevant to the issues raised by the request in this docket. The daily scheduled operating hours of postal stations and branches and polices for changing them are matters beyond the scope of the Station and Branch Optimization

and Consolidation Initiative and are not within the scope of the Postal Service's program of examining which stations and branches reporting to EAS-24 and above Postmaster should continue to operate. Accordingly, the Postal Service objects to providing the information requested in subparts (c-d) of this interrogatory. The fact that the Initiative in this docket relates to retail operations and is undergoing Commission review does not establish a pretext for inquiring about every other imaginable aspect of postal retail operations.

Moreover, the interrogatories seek to impose an undue burden on the Postal Service. In order to locate "all documents discussing . . . procedures" for "reducing the hours of operation" for retail units in its possession, the Postal Service would need to canvass thousands of employees at Headquarters, its 9 Area offices, 74 Districts offices and tens of thousands of retail facilities to identify all hard-copy or electronic documents discussing any aspect of the topic. Such an undertaking would involve many thousands of work hours for document collection and review. Given the absence of any connection between the topic of these interrogatories and the Initiative under review in this docket, the Postal Service should not be required to assume such a burden.

PR/USPS-T1-10

(b) Please describe how the Postal Service considers or will consider making changes to collection boxes. Please provide all documents discussing any changes to postal collection boxes (including the removal of collection boxes, relocation of collection boxes, and changes in collection times).

(c) Does the Postal Service have any procedures for making changes to collection boxes? If so, please describe such procedures and provide all documents discussing such procedures.

For the same reasons, the Postal Service objects to subparts (b-c) of

interrogatory PR/USPS-T1-10. They seek to impose a similarly undue burden by requesting access to all documents within the agency “discussing any changes to postal collection boxes” and “all documents” discussing ”procedures for making changes to collection boxes”.

In responding to PR/USPS-T1-10(a), the Postal Service has explained the options that local managers have, as part of this Initiative, in determining what to do with collection boxes in front of a discontinued station or branch. The requests for all documents in subparts (b-c) are overly broad and encompass matters irrelevant to and well beyond the scope of this docket.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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