

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

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

Docket No. N2009-1

**INTERROGATORIES OF THE AMERICAN POSTAL WORKERS UNION, AFL-CIO
TO USPS WITNESS ALICE VANGORDER
(APWU/USPS-T1-1-5)
(July 29, 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 Alice M. Vangorder (USPS-T-1). 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. Instructions and Definitions applicable to these Interrogatories are contained in the Interrogatories of the American Postal Workers Union, AFL-CIO to the United States Postal Service witness Kimberly Matalik (APWU/USPS-T2-1-9), filed on July 28, 2009, and are hereby incorporated by reference.

Respectfully submitted,

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Counsel for American Postal Workers Union, AFL-CIO

APWU/USPS-T1-1 Attachment A of your report provides a list of cities with stations/branches under consideration for consolidation under this initiative.

- a.) Are any states other than Wyoming missing from this list?
- b.) What percentage of the population of the U.S. lives in the listed cities?
- c.) How many delivery points, in total, are located in the listed cities?
- d.) What percentage of delivery points in the U.S. are in the areas that might either lose a station or branch or be impacted by the increased flow of patrons into the station or branch that they normally use?
- e.) What percentage of Zip Codes might see changes under this initiative?

APWU/USPS-T1-2 On page 11 of your testimony you state that no facility “will be consolidated unless a study demonstrates an opportunity for efficiency gains while maintaining ready access to adequate service.”

- a.) Please define “efficiency” as you use it in your testimony.
- b.) Does consideration of “efficiency” require consideration of both cost and service, or does it only require considerations of cost?
- c.) How do you measure efficiency?
- d.) Does the Postal Service consider increased costs or other efficiency degradations at the gaining facility in determining efficiency?
- e.) Is an evaluation of efficiency an objective or a subjective determination?
- f.) If it is objective, has the Postal Service developed criteria for determining what size efficiency gains will be necessary before a station or branch is consolidated?
- g.) If it is objective, has the Postal Service developed criteria for determining what level of service degradation to the customer will be acceptable within the definition of “access to adequate service?”
- h.) If the Postal Service has the criteria described in “e” and “f” above, what are they?
- i.) If the determination of “efficiency” is a subjective determination or if the Postal Service has not developed the criteria described in “e” and “f” above, has the Postal Service taken any step or steps to ensure that the level of efficiency and service is relatively equal in every district and area of the country?

- j.) If the Postal Service has taken the step or steps described in “h.” above, please identify by position and name the individuals who are responsible for ensuring that those steps are taken.

APWU/USPS-T1-3 In footnote 7 you state that while a change in carrier operations are outside the scope of the Initiative, there may be opportunities to consolidate carrier operations presently located at these stations and branches. If carrier operations are conducted at the same location as a station or branch that is on the list, is an evaluation of the carrier operations a part of the process for determining if a station or branch will be closed? If it is not feasible for the carrier operations to be moved to another facility would that be a consideration in deciding whether the retail portion of that facility should be kept open as well?

APWU/USPS-T1-4 In your response to PR/USPS T1-7 (d) you state “[w]hat may be an ‘adequate’ level of service or ‘ready access’ can vary on the basis of differences between cities and between urban and rural areas.”

- a.) Can you provide clarification of your understanding of the Postal Service’s policies concerning the level of variability among groups served that is acceptable in following these directives?
- b.) What differences between cities are relevant to a determination of the level of service that is acceptable?
- c.) Is adequate public transportation relevant to a determination of the level of service that is acceptable?
- d.) Is the socio-economic status of the community relevant to a determination of the level of service that is acceptable?
- e.) Is the density of population relevant to a determination of the level of service that is acceptable?
- f.) Assuming two urban areas are very similar in terms of every criterion considered relevant by the Postal Service, what level of service degradation to the customer will be acceptable within the definition of “access to adequate service.”
- g.) Assuming two rural areas are very similar in terms of every criterion considered relevant by the Postal Service, what level of service degradation to the customer will be acceptable within the definition of “access to adequate service.”
- h.) How does the Postal Service determine whether urban and rural areas are receiving relatively equal or fair levels of service given that the types of services needed are somewhat different between the two types of areas?

APWU/USPS-T1-5 What, if anything, is the Postal Service doing to consider the environmental impact of this nationwide initiative?