

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

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

Docket No. N2009-1

PUBLIC REPRESENTATIVE
THIRD SET OF INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS TO UNITED STATES POSTAL SERVICE
WITNESS ALICE M. VANGORDER (PR/USPS-T1-11)

(July 31, 2009)

Pursuant to Rules 25 through 28 of the Postal Regulatory Commission Rules of Practice, the Public Representative hereby submits the following interrogatories and requests for production of documents. If necessary, please redirect any interrogatory or request to a more appropriate Postal Service witness. Definitions and instructions included with the Public Representative's interrogatories PR/USPS-1-6 dated July 10, 2009, are hereby incorporated by reference.

Respectfully Submitted,

/s/ Robert Sidman

Robert Sidman
Public Representative for
Docket No. N2009-1

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PR/USPS-T1-11

Please refer to your response to PR/USPS-T1-9(a) where you state that “the opening and closing hours for individual stations and branches are matters that have not been considered in connection with the Initiative.”

- a. Please confirm that adjusting hours would reduce operating costs of a branch or station. If confirmed, please explain why adjustment of operating hours is not part of the Initiative.
- b. Please confirm that the Initiative is set up such that there are only two options: (a) a facility is either closed, or (b) a facility remains open. If you do not confirm, please explain.
- c. In formulating the Initiative, did the Postal Service consider alternatives to closure or consolidation such as a reduction in operating hours, reduction in the number of days of operation, or other cost savings measures at stations or branches? If so, please explain why such cost savings are not part of the Initiative.