

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 KIMBERLY I. MATALIK (PR/USPS-T2-15-23)

(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

901 New York Avenue, N.W.
Washington, DC 20268-0001
(202) 789-6827; Fax (202) 789-6891
e-mail: robert.sidman@prc.gov

PR/USPS-T2-15

Please refer to your response to PR/USPS-T2-2, your July 17, 2009 revised testimony at page 4 lines 8 through 35, and page 5 line 13 through page 6 line 6.

- a. You state that the Postal Service considers “customer concerns” expressed by mail users in response to questionnaires and community meetings.
 1. Please explain how much advanced notification is given, and how and where that advance notification is provided, to postal customers during the prescreening process and during a discontinuance study informing them of:
 - A. the Postal Service’s review of a station or branch for possible closure or consolidation;
 - B. a public meeting sponsored by the Postal Service to receive customer comments concerning the possible closure or consolidation of a station or branch;
 - C. the availability of a Postal Service customer questionnaire concerning the possible closure or consolidation of a station or branch; and
 - D. other methods of receiving public comment.
 2. Does the Postal Service consider written customer concerns that are not expressed on the questionnaire form? If so, how does the Postal Service communicate this potential avenue of expression to mail users?
 3. Does the Postal Service consider customer concerns expressed by e-mail? If so, how does the Postal Service communicate this potential avenue of expression to mail users?
 4. Does the Postal Service consider customer concerns expressed by phone? If so, how does the Postal Service communicate this potential avenue of expression to mail users?
 5. On page 4, line 21, you state that that one of the things the Postal Service examines is “customer concerns as expressed in response to questionnaires or in a community meeting.” You also state on page 5, line 13 that “For purposes of obtaining customer input, either a public meeting is conducted or responses to a customer questionnaire are solicited.”
 - A. Are there circumstances where the Postal Service will only hold a community meeting and not distribute questionnaires?
 - B. If so, if a potential attendee cannot attend the community meeting, but wishes to voice comments, how does that individual share his or her concerns with the Postal Service?

- b. You state that “questionnaires are placed in each customer’s Post Office box and mailed to carrier delivery customers of the station or branch being considered for discontinuance.”
 - 1. Are the questionnaires mailed to all delivery customers of the station or branch being considered for discontinuance? If not, please explain how the delivery customers are selected to receive a questionnaire. What percentage of delivery customers receive a questionnaire?
 - 2. What are the methods for a mail user to return a completed questionnaire? If one of the methods is by mail, is the postage paid for returning completed questionnaires paid for by the mail user or the Postal Service?
- c. You state that “standard data collection forms and instructions, as well as customer notification letter and questionnaire templates are provided to each District office for use.” Please provide copies of these standard data collection forms, instructions, and customer notification letter and questionnaire templates.

PR/USPS-T2-16

In response to PR/USPS-T2-3, you stated that the “‘directive’ to initiate studies was communicated during teleconferences between Headquarters and Area managers.”

- a. Were any materials or documents (including e-mails) distributed to potential attendees prior to the teleconferences? If so, please provide copies of those materials or documents.
- b. Were any materials or documents distributed as follow up to the teleconferences? If so, please provide copies of those materials.
- c. Please provide a list of the dates and times of the teleconferences including the length of each conference.
- d. Please provide the number of attendees at each teleconference and the titles of the attendees.
- e. Was an agenda prepared for any of these teleconferences? If so, please provide copies of those agendas.
- f. Did the Postal Service prepare any formal minutes of, or did any Postal Service employee take written or typed notes during any of the teleconferences? If so, please provide copies of those notes and minutes.
- g. Please provide the names and titles of the individuals leading the teleconferences.
- h. Please provide written summaries of each teleconference.

PR/USPS-T2-17

Please refer to PR/USPS-T2-3 which requested copies of “all other documents related to the Headquarters initiative.” In your response, you stated that the “‘Headquarters initiative’ is the subject of this docket; as such, see materials filed in connection with PRC Docket No. N2009-1, including materials filed in connection with Public Representative questions today.”

- a. Please describe the search methodology used (including, but not limited to, Boolean searches of computer files and e-mails, file locations, and discussions with Postal Service employees) by you to identify and locate documents responsive to this request for documents.
- b. Please refer to the results of the search methodology described in response to subpart a of this interrogatory. Please confirm that other than the Postal Service’s Request, the Testimony filed in this case, the briefing filed in response to PR/USPS-4(a), and the Post Office Discontinuance Guide, there are no documents that relate to the Headquarters initiative. If you do not confirm, please explain. If such documents do exist, please provide copies of them.

PR/USPS-T2-18

Please refer to PR/USPS-T2-4 and your response to that interrogatory. In PR/USPS-T2-4, the Public Representative asked for an explanation as to how headquarters identifies stations and branches for review. You responded by pointing to testimony that stated “The immediate focus of this Optimization Initiative is upon stations and branches subordinate to EAS-24 and above Post Offices.” Other than directing district managers to review stations and branches subordinate to EAS-24 and above Post Offices, does Headquarters provide area or district managers any guidance as to how to prioritize the review of the stations and branches within a given district or area? If so, please provide such guidance. Is the responsibility on how to best prioritize the review of stations and branches within a given district or area left to the discretion of the district managers or other managers? Please explain.

PR/USPS-T2-19

Has Headquarters established deadlines, target dates or any milestones for district managers or other managers with respect to the prescreening process or any portions thereof? If so, please provide those milestones, target dates, and deadlines.

PR/USPS-T2-20

Please provide copies of all e-mails and other documents sent or received by you that provide guidance, instructions, or responses to questions about the prescreening process portion of the Initiative to or from area or district managers.

PR/USPS-T2-21

Please refer to your response to PR/USPS-T2-9 where you state that the “prescreening process responds to a management problem respective Area and District offices face: determining which among the 3200 nominees should be studied first as part of a centrally-directed Initiative.” Please also refer to your response to PR/USPS-T2-10.

- a. How do the Area and District offices determine which among the 3200 nominees should be studied first, second, third, etc.?
- b. Other than communicating to the district offices that they should consider the factors listed in your testimony (from page 8, line 16 through page 9, line 25), please confirm that Headquarters and the area offices provide no guidance or instructions to the district offices for determining which among the 3200 nominees should be studied first as part of the prescreening process. If you do not confirm, please explain and provide the other instructions or guidance that the district offices receive to help prioritize which among the 3200 branches and stations should be studied first, second, third, etc.

PR/USPS-T2-22

Is there any opportunity for public comment during the prescreening process? If so, please explain those public comment procedures and how the Postal Service takes those public comments into account.

PR/USPS-T2-23

On page 6-7 of your testimony, you discuss the number of decisions to discontinue stations and branches since FY2005.

- a. During that same time period, how many stations and branches were subject to a discontinuance study?
- b. Of the number of stations and branches subject to a discontinuance study listed in subpart a of this interrogatory, how many of those stations and branches resulted in closure or consolidation of the facility being studied?