

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

STATION AND BRANCH OPTIMIZATION AND
CONSOLIDATION INITIATIVE, 2009

DOCKET NO. N2009-1

INTERROGATORIES OF DAVID B. POPKIN TO THE UNITED STATES POSTAL
SERVICE [DBP/USPS-32 - 33]

David B. Popkin hereby requests the United States Postal Service to answer, fully and completely, the following interrogatories pursuant to the Commission's Rules of Practice and Procedure. To the extent that a reference is made in the response to a Library Reference, I would appreciate receiving a copy of the reference since I am located at a distance from Washington, DC. Any reference to testimony or other sources should indicate the page and line numbers. The instructions contained in the interrogatories DFC/USPS-T1-1-6 in Docket MC2006-7 dated February 23, 2007, are incorporated herein by reference. I am available for informal discussion to respond to your request to "clarify questions and to identify portions of discovery requests considered overbroad or burdensome."

August 6, 2009

Respectfully submitted,

N20091D32

DAVID B. POPKIN, POST OFFICE BOX 528, ENGLEWOOD, NJ 07631-0528

DBP/USPS-32 The USPS July 28, 2009, listing of Station/Branches Identified For Full Study shows at least one Main Office - Fredericksburg, Virginia = other facilities may also be Main Offices but are not recognizable by the name shown on the listing as the Main Office.

[a] Should this facility be shown on the list of stations or branches?

[b] Are Main Office facilities subject to being consolidated or closed under this proceeding?

[c] If so, please explain why and under what conditions.

DBP/USPS-33 The USPS July 28, 2009, listing of Station/Branches Identified For Full Study shows the United Nations station of the New York, NY post office. Can this facility be consolidated based on the outstanding agreement between the United States Postal Service and the United Nations Postal Administration?