

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-34 - 36]

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 7, 2009

Respectfully submitted,

N20091E34

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

DBP/USPS-34 The USPS July 28, 2009, listing of Station/Branches Identified For Full Study shows some 53 stations and branches in the five boroughs of New York City. *The New York Times* for August 5, 2009 indicates that there are only 14 offices being considered for closing in the five boroughs of New York City.

[a] On the current listing of stations and branches being identified for full study, how many are in the five boroughs of New York City.

[b] Please furnish the latest countrywide listing.

[c] Please explain the specific criteria that were utilized to either add or delete facilities from the listing.

DBP/USPS-35

In testimony before the Senate Subcommittee on August 6, 2009, the Postmaster General indicated that any request to close a station or branch will be proposed by the District and then be approved by the Area, and then finally be approved by Headquarters.

[a] Please confirm, or explain if you are unable to confirm, that the Postal Service will follow the procedure as noted above.

[b] Please provide the specific guidelines that a District Manager will utilize to either keep a station/branch on the list for full study or to remove a station/branch from the listing.

[c] Please provide the specific guidelines that a District Manager will utilize to ultimately propose the closing or consolidation of a specific station or branch.

[d] Please advise the specific guidelines that the Area will utilize to evaluate each proposed request from a District Manager to close or consolidate a specific station/branch.

[e] Please advise the titles of the individuals at the Headquarters level who will evaluate the requests that are forwarded by the Area to close or consolidate a specific station/branch.

[f] Please advise the specific guidelines that Headquarters will utilize to evaluate each proposed request from a District Manager to close or consolidate a specific station/branch.

DBP/USPS-36

In the hearing before the Senate Subcommittee on August 6, 2009, Senator Collins indicated that if the Postal Service were to close all of the facilities on the USPS July 28, 2009, listing of Station/Branches Identified For Full Study it would result in a reduction of operating costs [minus labor] of only six-tenths of one percent.

Please confirm her evaluation or provide the Postal Service's evaluation of the correct value. Please provide details of the calculation.