

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

STATION AND BRANCH OPTIMIZATION AND
CONSOLIDATION INITIATIVE, 2009

Docket No. N2009-1

OBJECTION OF THE UNITED STATES POSTAL SERVICE TO
AMERICAN POSTAL WORKERS UNION INTERROGATORY
APWU/USPS-T1-1(b)
(August 10, 2009)

In accordance with Rule 26(c) of the Postal Regulatory Commission's Rules of Practice and Procedure, the United States Postal Service hereby files the following objections to the interrogatories below submitted by the American Postal Workers Union on July 29, 2009.

APWU/USPS-T1-1

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

...

b.) What percentage of the population of the U.S. lives in the listed cities?

...

The Postal Service objects to this interrogatory. It seeks the compilation of public non-postal information that may be obtained by APWU using its own resources, rather than requesting that the Postal Service assume the burden of doing so. APWU is free to obtain the latest U.S. Census Bureau population data reported for the 396 cities listed in the Attachment to USPS-T-1, compile those numbers and compare them to the total national population in order to derive the percentage sought in response to this interrogatory. The imposition of such a burden on the Postal Service would be undue.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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