

STATION AND BRANCH OPTIMIZATION AND
CONSOLIDATION INITIATIVE, 2009

DOCKET NO. N2009-1

DAVID B. POPKIN MOTION TO COMPEL RESPONSE TO INTERROGATORY
DBP/USPS-31

I move to compel response to the interrogatory submitted to the United States Postal Service that has been objected to by them.

August 10, 2009
N20091MTC2

Respectfully submitted,

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

On July 17, 2009, I submitted Interrogatory DBP/USPS-31. On July 27, 2009, the Postal Service filed an objection to this interrogatory.

The interrogatory reads as follows:

DBP/USPS-31 It would appear that the Postal Service has either instituted or is considering institution of summer hours for retail window service hours. This would result in the reduction of retail window service hours and/or lobby access hours at some post offices, including stations and branches of some post offices, during the summer time frame and perhaps beyond.

Please furnish details of any such programs that have been or are being planned at the Area level or above. Please also furnish copies of any memoranda or directives that have been issued at the Area level or above which are related to the temporary or permanent reduction in retail window service hours and/or lobby access hours.

The Postal Service bases its Objection because it seeks information that will not lead to the discovery of admissible evidence.

If one evaluates the response of the Postal Service to Interrogatory DBP/USPS-30, it becomes evident that the efforts being made in the Docket will not be limited to an all or nothing solution for each of the facilities but will be examined based on its unique potential. Based on this response, one of the possible actions taken with respect to a station or branch of a level 24 or above facility could be the reduction of retail window service hours and/or lobby access hours as noted in the objected to Interrogatory DBP/USPS-31. As such it is a most relevant topic and should be of interest to the Commission.

The following is Interrogatory DBP/USPS-30 filed on July 15, 2009 and the response dated August 6, 2009.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY FROM DAVID POPKIN
DBP/USPS-30**

[a] In the evaluation of a specific station or branch of a Level 24 or higher post office, will the Postal Service be limited to one of only two choices, namely maintain status quo or complete discontinuance of the facility or will the Postal Service consider making some partial elimination of service at that facility?

[b] If the Postal Service will limit their choice to only one of two options [the first choice in subpart a], please explain why that option was chosen.

[c] Please provide a listing of the different types of partial eliminations of service that could be employed at a specific station or branch of a Level 24 or higher post office.

RESPONSE

(a-b) No, the Postal Service will not be limiting its choices to one of two.

(c) Each situation must be examined based upon its unique potential. As testimony explains, the first question answered is whether a discontinuance study is warranted. Assuming that answer is favorable, subsequent options might be to maintain the status quo, move carriers to a different location and downsize the required space for retail, relocate a piece of mail processing equipment, increasing or decreasing the footprint of the studied facility, or any combination that best suits a particular location or locations. That is why local postal officials must study each situation and document the merits of any proposed reconfiguration.

For the reasons stated, I move to compel responses to the referenced interrogatory since it is reasonably calculated to lead to the discovery of admissible evidence.