

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

STATION AND BRANCH OPTIMIZATION AND
CONSOLIDATION INITIATIVE, 2009

Docket No. N2009-1

OBJECTIONS OF THE UNITED STATES POSTAL SERVICE TO
PUBLIC REPRESENTATIVE INSTITUTIONAL INTERROGATORIES
PR/USPS-T2-16(d,f), 17(a,b) and 23
(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 Public Representative on July 30, 2009.

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."

- d. Please provide the number of attendees at each teleconference and the titles of the attendees.
- 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.

The Postal Service objects to subpart (d) because it is not reasonably calculated to lead to the production of admissible evidence that has any bearing on any material issue pertaining to whether the service changes resulting from implementation of the Station and Branch Optimization and Consolidation (SBOC) Initiative would conform to the policies of title 39, United States Code. The Postal Service should not be required to waste a scintilla of effort to confirm which Area Vice Presidents and/or their

designees and/or subordinates who sat in on which teleconferences during the Areas were directed to initiate the pre-screening process and discontinuance studies that comprise the SBOC initiative. The essential fact – that the Areas were directed – was revealed. There is no issue within the scope of the Commission’s review authority under section 3661 that depends on it knowing the number of Area management officials that represented each Area during each teleconference or their titles.

The Postal Service objects to subpart (f), but only insofar as it may be construed as seeking uncirculated personal notes of any of the teleconference attendees, which the Postal Service does not regard as agency records within its custody or control. No minutes of the teleconferences were recorded.

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.

The Postal Service objects to subpart (a) of this interrogatory insofar as it may be interpreted as seeking disclosure of privileged attorney-client communications.

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?

The Postal Service hereby incorporates by reference its August 7, 2009, objections to APWU/USPS-DR-3 and objects to this interrogatory. On the basis of the Table in USPS-T-2, it is known that 96 station/branch discontinuance proposals were approved by Headquarters between 2005 and 2008. As referenced in its objection to APWU/USPS-DR-3, records reflecting those discontinuance decisions are available for public inspection in the USPS Headquarters Library during regular business hours in accordance with 39 C.F.R. § 265.5.

If not part of a centrally-directed initiative, discontinuance studies may be started at the local level and terminated, suspended, abandoned, or otherwise just not completed without a discontinuance proposal ever reaching Headquarters for consideration or the existence of such a proposal ever being communicated to Headquarters. It would be unduly burdensome to impose upon the Postal Service the burden of searching the records of each of its 74 District offices and 9 Area offices to determine how many locally-initiated discontinuance studies may have been launched but never completed or submitted to Headquarters during 2005-2008. It is estimated that several hundred workhours would be expended to provide an accurate count of all such studies. The Postal Service objects to the diversion of the resources in each of

these offices for the purpose of providing a piece of trivia that has no bearing on whether the service changes resulting from implementation of the Station and Branch Optimization and Consolidation (SBOC) Initiative would conform to the policies of title 39, United States Code. The burden of such an undertaking grossly exceeds any bearing that information responsive to PR/USPS-T2-23 could have on any issue in this docket.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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