

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 INTERROGATORIES
PR/USPS-7, 14, 16(c,e) AND 17
(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 31, 2009.

PR/USPS-7

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 the Postal Service to identify and locate documents responsive to the following interrogatories:

- a. PR/USPS-T1-7(a) and (b)
- b. PR/USPS-1
- c. PR/USPS-4
- d. PR/USPS-6

The Postal Service objects to this interrogatory to the extent that it can be interpreted as seeking records reflecting the substance privileged attorney-client communications.

PR/USPS-14

With respect to instructions and guidance disseminated by Headquarters about the Initiative, please identify, describe and provide all documents (including e-mails) detailing questions or requests for clarification from managers at any level at the Postal Service and any responses or clarifications issued by Headquarters to those questions or clarifications.

The Postal Service objects to this interrogatory to the extent that it can be interpreted as seeking records reflecting the substance privileged attorney-client communications. An additional objection is raised on the grounds that the interrogatory is overly broad. Production of the requested response would impose an undue burden on the Postal Service by requiring it to search all of its records to determine the existence of records of all communications by any of thousands of managers who may have communicated questions or solicited clarification of some aspect of the Station and Branch Optimization and Consolidation (SBOC0 Initiative. It is estimated that thousands of hours of document search and review would need to be expended in order to respond fully to this interrogatory. What the Postal Service will endeavor to do is to disclose any documents prepared by Headquarters that have been generated for the purpose of answering frequently asked questions.

PR/USPS-16

. . .

- c. Please describe the procedures used when the Postal Service seeks to close or consolidate a community post office or contract postal unit. Please provide copies of any documents detailing such procedures.

- e. Please describe the procedures used when the Postal Service seeks to close or consolidate a consignment arrangement. Please provide copies of any documents detailing such procedures.

Contract postal unit and consignment stamp sale arrangements are governed by

the terms of contracts between the Postal Service and private entities and are not matters within the scope of the SBOC Initiative or the station/branch discontinuance process. Accordingly, the Postal Service objects to subparts (c) and (e) of this interrogatory as seeking information irrelevant to the issues raised by the request in this proceeding.

PR/USPS-17

Please refer to your response to PR/USPS-T1-7(a-b), (b).

a. Please confirm that that Postal Service does not have any guidance documents, briefings, directives, instructions or other documents that discuss how the Postal Service determines whether a particular closure or consolidation of a branch or station will ensure that there is “ready access to essential postal services” and “ready access to adequate service.” If you do not confirm, please explain. If such documents do exist, please provide copies of such documents.

The Postal Service objects to this interrogatory to the extent that it can be interpreted as seeking records reflecting the substance privileged attorney-client communications.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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