

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

STATION AND BRANCH OPTIMIZATION AND
CONSOLIDATION INITIATIVE, 2009

Docket No. N2009-1

RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO DAVID POPKIN INTERROGATORIES DBP/USPS-32 THROUGH 36
(August 20, 2009)

The United States Postal Service hereby provides its responses to the following institutional interrogatories of David Popkin dated August 6, 2009: DBP/USPS-32 and 33. Also provided are responses to the following institutional interrogatories of David Popkin dated August 7, 2009: DBP/USPS-34 through 36. Each interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Pricing and Product Support

Michael T. Tidwell
Attorney

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2998; Fax -5402
michael.t.tidwell@usps.gov

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DAVID POPKIN**

DBP/USPS-32

The USPS July 28, 2009, listing of Station/Branches Identified For Full Study shows at least one Main Office - Fredericksburg, Virginia =other facilities may also be Main Offices but are not recognizable by the name shown on the listing as the Main Office.

- [a] Should this facility be shown on the list of stations or branches?
- [b] Are Main Office facilities subject to being consolidated or closed under this proceeding?
- [c] If so, please explain why and under what conditions.

RESPONSE

- (a-c) The SBOC Initiative is focused on stations and branches that report to Postmasters at or above the EAS-24 pay grade. The list is intended to correspond. To the extent that it does not, periodic review is expected to improve the list through correction. See the response to DBP/USPS-34.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
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DBP/USPS-33

The USPS July 28, 2009, listing of Station/Branches Identified For Full Study shows the United Nations station of the New York, NY post office. Can this facility be consolidated based on the outstanding agreement between the United States Postal Service and the United Nations Postal Administration?

RESPONSE

That objective of the SBOC Initiative discontinuance review is for Headquarters is to take relevant considerations into account in determining whether to approve local proposals to consolidate particular stations and branches. If and when Headquarters receives a proposal to discontinue or consolidate any station or branch within the scope of this Initiative, it will review that proposal and make a determination based on relevant considerations.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DAVID POPKIN**

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.

RESPONSE

(a-c) The latest listing was filed in USPS Library Reference N2009-1/4 on July 30, 2009. Any lists that supersede it will also be filed in that Library Reference periodically with an appropriate notice. The list was compiled using the pre-screening process described in USPS-T-2. Any additions will reflect the continuation of the pre-screening process. Deletions will reflect corrections to the list. In compiling the list of facilities, the Postal relies on city and state information of the Post Office to which the station or branch reports. For purposes of the list, the Postal Service does not systematically record other political subdivisions, such as county, borough, or municipal ward or district.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
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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.

RESPONSE

- (a) The Postmaster General speaks for the Postal Service.
- (b) The list is managed by Headquarters and is intended to reflect candidate facilities submitted by the field as a result of the pre-screening process described in USPS-T-2
- (c) Please review USPS-T-2, as well as USPS LR N2009-1/3 and USPS LR N2009-1/6.
- (d) Please see the response to subpart (c).
- (e) Please see the titles of the postal witnesses in this docket. They will, as needed, confer with others working under their direction.
- (f) Please see the response to subpart (c).

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DAVID POPKIN**

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.

RESPONSE

The Senator's evaluation cannot be confirmed, as the Postal Service has not been informed of the data or the methodology with which the value was derived.

The Postal Service will be conducting facility-specific studies of stations and branches on the list and, on a case-by-case basis, developing estimates of potential cost savings. The details will emerge in the form of each study. When the Postal Service has completed its analysis of the hundreds of individual studies, it will have a "correct" value.