

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

STATION AND BRANCH OPTIMIZATION AND  
CONSOLIDATION INITIATIVE, 2009

Docket No. N2009-1

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS VANGORDER  
TO PUBLIC REPRESENTATIVE INTERROGATORY PR/USPS-T1-11  
(August 17, 2009)

The United States Postal Service hereby provides the responses of witness VanGorder to the following interrogatory of Public Representative Sidman filed on July 31, 2009: PR/USPS-T1-11. The interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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## **RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS VANGORDER TO PUBLIC REPRESENTATIVE INTERROGATORY**

### **PR/USPS-T1-11**

Please refer to your response to PR/USPS-T1-9(a) where you state that “the opening and closing hours for individual stations and branches are matters that have not been considered in connection with the Initiative.”

- a. Please confirm that adjusting hours would reduce operating costs of a branch or station. If confirmed, please explain why adjustment of operating hours is not part of the Initiative.
- b. Please confirm that the Initiative is set up such that there are only two options: (a) a facility is either closed, or (b) a facility remains open. If you do not confirm, please explain.
- c. In formulating the Initiative, did the Postal Service consider alternatives to closure or consolidation such as a reduction in operating hours, reduction in the number of days of operation, or other cost savings measures at stations or branches? If so, please explain why such cost savings are not part of the Initiative.

### **RESPONSE**

(a-c) I am not a costing witness. However it seems that the answer to this question would depend on the direction of the adjustment, upward or downward. The purpose of the Initiative is to pursue opportunities to discontinue or consolidate station/branch operations, not to simply adjust operating hours or operating days upward or downward. Accordingly, the focus is on discontinuance and consolidation. In conjunction with the separate program for the consolidation of carrier operations, the discontinuance study process could lead to facilities being either closed or consolidated. If a consolidation occurs, there will be cases where either only the “front of the house” retail operation or the “back of the house” carrier operation remains at a given location.