

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 PUBLIC REPRESENTATIVE INTERROGATORIES PR/USPS-9, 15, 17-18, 20
(August 18, 2009)

The United States Postal Service hereby provides responses to the above-listed interrogatories of the Public Representative, filed on July 31, 2009. Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO PUBLIC REPRESENTATIVE INTERROGATORY**

PR/USPS-9

Please refer to your responses to PR/USPS-3(c)-(e). Please also refer to Library Reference USPS-LR-N2009-1.

- a. Please provide an estimate of the total cost savings and revenue loss from the closure the branches and stations listed in Library Reference USPS-LR-N2009-1.
- b. Please provide an estimate of the total cost savings and revenue loss from the closure the “less than 1000 branches and stations” estimated to be identified for a full discontinuance study in the response to PR/USPST2-9.

RESPONSE

(a-b) It is not clear to which list subpart (a) refers. In any event, in the absence of facility-specific cost data of the sort that will be generated through the hundreds of facility-specific studies that will be conducted as part of the initiative, the Postal Service could only provide an uninformed and unhelpful guess regarding cost savings that will result from the consolidation of the yet unknown number (fewer than 1000) of stations and branches remaining within the scope of this initiative. Nor has the Postal Service developed a methodology for estimating the potential revenue losses that might result from station/branch closing, either on a facility-specific basis or for the purpose of projecting over the fewer than 1000 stations/branches that might be discontinued or consolidated as a part of this initiative.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO PUBLIC REPRESENTATIVE INTERROGATORY**

PR/USPS-15

Please refer to your response to PR/USPS-T2-11.

- a. Please confirm that your responses to subparts (a)(1) through (a)(5) of PR/USPS-T2-11 are "yes." If you do not confirm, please list the factors of subparts (a)(1) through (a)(5) that the Postal Service does not consider when examining stations or branches for discontinuance.
- b. Please confirm that the Postal Service does not always provide at least 60 days notice prior to closing or consolidating a branch or station. If you do not confirm, please explain.
- c. Please confirm that the Postal Service does not always provide persons with notice that a Postal Service final determination to close or consolidate a branch or station may be appealed to the Postal Regulatory Commission. If you do not confirm, please explain.
- d. Please confirm that your response to subpart (d) of PR/USPS-T2-11 is "yes." If you do not confirm, please describe the circumstances where the Postal Service would not provide its determination to close or consolidate a branch or station in writing.

RESPONSE

- (a) Confirmed.
- (b) It is confirmed that, in all of the instances in which it discontinued operations of a station or branch that there have been instances where the public was not given 60 days between the date of the decision and the date of its implementation.
- (c) It can be confirmed that, as a matter of practice, when closing a station or branch, the Postal Service does not provide persons with a notice that, it is the view of the Commission that any or all such discontinuance decisions may be appealed to the Commission.
- (d) Confirmed

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
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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.
- b. Please explain how the “District team applies its expert judgment to the facts on the ground in each case.” Please provide copies of any documents that discuss how the District team applies its expert judgment to the facts on the ground in each case.

RESPONSE

- (a) Confirmed.
- (b) Please see Library Response to PR/USPS-4, Page 11 of the Powerpoint presentation.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO PUBLIC REPRESENTATIVE INTERROGATORY**

PR/USPS-18

Please refer to your response to PR/USPS-3(c). Please provide the Postal Service's best estimate of the range of cost savings and revenue loss that it expects to occur as a result of the closure or consolidation of the branches and stations subject to the Initiative.

RESPONSE

Please see the response to PR/USPS-9(a) and 9(b)

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
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PR/USPS-20

Please refer to your objection to DBP/USPS-6 where you state that the “Postal Service concedes that some retail stations and branches subject to the Station and Branch Optimization and Consolidation Initiative may have Bulk Mail Entry Unit (BMEU) operations, and that a decision to consolidate stations or branches may result in elimination or relocation of BMEU function.” Is the effect on BMEU operations one of the factors or elements that the Postal Service considers during either (a) the prescreening process of the Initiative or (b) a discontinuance study process when deciding whether to close or consolidate a particular branch or station? Please explain.

RESPONSE

Yes. If there is a BMEU at a facility being considered for consolidation, the feasibility of relocating its operations must be considered.