

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

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Station and Branch)
Optimization and)
Consolidation Initiative, 2009)
)

Docket No. N2009-1

PUBLIC REPRESENTATIVE
FOURTH SET OF INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS TO UNITED STATES POSTAL SERVICE
WITNESS ALICE M. VANGORDER (PR/USPS-T1-12-13)

(August 20, 2009)

Pursuant to Rules 25 through 28 of the Postal Regulatory Commission Rules of Practice, the Public Representative hereby submits the following interrogatories and requests for production of documents. If necessary, please redirect any interrogatory or request to a more appropriate Postal Service witness. Definitions and instructions included with the Public Representative's interrogatories PR/USPS-1-6 dated July 10, 2009, are hereby incorporated by reference.

Respectfully Submitted,

/s/ Robert Sidman

Robert Sidman
Public Representative for
Docket No. N2009-1

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PR/USPS-T1-12

Please refer to your response to APWU/USPS-T1-2(d) where you state “As part of each discontinuance study, the Postal Service estimates the costs expected to be saved by the elimination of the provision of service at a particular location.”

- a. Does the Postal Service consider loss of revenue from the closure of that particular location in determining whether to close a particular facility? Please explain.
- b. Are the “cost expected to be saved” referenced in your response to APWU/USPS-T1-2(d) net cost savings?
- c. If the Postal Service does not consider loss of revenue from the closure of a particular location in calculating the net cost savings, is the Postal Service assuming that all business lost at that particular facility will migrate to other postal facilities or alternate access channels? If not, please explain.

PR/USPS-T1-13

With respect to the Station and Branch Optimization and Consolidation Initiative (Initiative), please provide the following information.

- a. When does the Postal Service expect to complete closure or consolidation of the stations and branches approved for closure or consolidation as a result of the Initiative?
- b. When does the Postal Service expect to calculate the “efficiency gains” (as that term is used in your response to APWU/USPS-T1-2(a-c)) resulting from closure or consolidation of the approved stations and branches?
- c. When does the Postal Service expect to report to the Commission the “efficiency gains” (as that term is used in your response to APWU/USPS-T1-2(a-c)) resulting from closure or consolidation of the approved stations and branches?
- d. Please describe how the Postal Service intends to calculate the “efficiency gains” (as that term is used in your response to APWU/USPS-T1-2(a-c)) resulting from closure or consolidation of the approved stations and branches.

- e. Please describe how the Postal Service intends to report to the Commission the “efficiency gains” (as that term is used in your response to APWU/USPS-T1-2(a-c)) resulting from closure or consolidation of the approved stations and branches.
- f. Please identify and describe the type of information to be calculated concerning the “efficiency gains” (as that term is used in your response to APWU/USPS-T1-2(a-c)) resulting from closure or consolidation of the approved stations and branches. For example, will the information include data on the number of stations affected, changes in revenue (if any), net cost savings, customer’s affected, changes in the number postal employees, etc.? Please explain.
- g. Please identify and describe the type of information to be reported to the Commission concerning the “efficiency gains” (as that term is used in your response to APWU/USPS-T1-2(a-c)) resulting from closure or consolidation of the approved stations and branches. For example, will the information to be reported include data on the number of stations affected, changes in revenue (if any), net cost savings, customer’s affected, changes in the number postal employees, etc.? Please explain.
- h. Will the type of information to be calculated also include data on how the Postal Service maintained “ready access to essential postal services” and “ready access to adequate service” (as that term is used in your response to PR/USPS-T1-7(d))for postal customers affected by the closure or consolidation of the approved stations and branches? Please explain.
- i. Will the type of information to be reported to the Commission also include data on how the Postal Service maintained “ready access to essential postal services” and “ready access to adequate service” (as that term is used in your response to PR/USPS-T1-7(d)) for postal customers affected by the closure or consolidation of the approved stations and branches? Please explain.