

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

STATION AND BRANCH OPTIMIZATION AND
CONSOLIDATION INITIATIVE, 2009

Docket No. N2009-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO PUBLIC REPRESENTATIVE INTERROGATORY
REDIRECTED FROM WITNESS MATALIK
(PR/USPS-T2-17)
(September 1, 2009)

The United States Postal Service hereby provides an institutional response to the following Public Representative interrogatory: PR/USPS-T2-17, which was filed on July 31, 2009. The interrogatory was redirected from witness Matalik to the Postal Service for response. The interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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**RESPONSE OF THE UNITED STATES POSTAL SERVICE
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PR/USPS-T2-17

Please refer to PR/USPS-T2-3 which requested copies of “all other documents related to the Headquarters initiative.” In your response, you stated that the “Headquarters initiative’ is the subject of this docket; as such, see materials filed in connection with PRC Docket No. N2009-1, including materials filed in connection with Public Representative questions today.”

- a. 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 you to identify and locate documents responsive to this request for documents.
- b. Please refer to the results of the search methodology described in response to subpart a of this interrogatory. Please confirm that other than the Postal Service’s Request, the Testimony filed in this case, the briefing filed in response to PR/USPS-4(a), and the Post Office Discontinuance Guide, there are no documents that relate to the Headquarters initiative. If you do not confirm, please explain. If such documents do exist, please provide copies of them.

RESPONSE

- (a-b) No agency-wide search was conducted to determine if any of the hundreds of thousands of employees with knowledge of SBOC Initiative might have generated records that are in some way “related to” it, or the hundreds of employees in District offices who may have communicated with their counterparts in Area offices regarding implementation of the Initiative. It is assumed that such documents may exist. Likewise, no search was conducted to locate acknowledgment letters generated by the USPS Consumer Advocate at Headquarters or in the field in response to customer inquires related to particular stations and branches. It is assumed that such documents may exist. And no search was conducted to identify records being generated on a daily basis in District or Area offices that relate to the SBOC Initiative – records that are being

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RESPONSE to PR/USPS-T2-17 (continued)

generated in the course of the hundreds of pre-decisional discontinuance studies currently underway, that are expected to be submitted to Headquarters for decision. It is known that such documents exist.

The Postal Service highlights these examples to emphasize that the interrogatory is, by any objective standard and perhaps unintentionally, overly broad.

The Postal Service has elected to respond reasonably to such interrogatories, rather than to simply file objections. It is the Postal Service's expectation that reasonable answers will be deemed sufficiently responsive for purposes of this docket, and that its decision not to interpret overly broad interrogatories literally and conduct paralyzing agency-wide searches for "all" other records that were in any way arguably "related to" the SBOC Initiative would be viewed as appropriate under the circumstances. Accordingly, the Docket No. N2009-1 litigation team (witnesses and counsel) have focused on locating records that were created to define or explain the scope of the Initiative or to broadcast guidance or instruction to the field regarding its implementation. Known locations of hard-copy, electronic and e-mail files at Headquarters, which are in the custody of the witnesses in this proceeding, have been searched. Hence, the production of Library References N2009-1/3, N2009-1/5, N2009-1/6 and N2009-1/8., and various other materials in

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RESPONSE to PR/USPS-T2-17 (continued)

response to interrogatories. It is likely that those documents have served as a basis for e-mail chatter among Area and District employees responsible for conducting and/or reviewing discontinuance studies:

What's the deadline? Why is this station on the list? Who do I call for an interpretation of this guideline? When is that study going to be completed? Do we use walk-in revenue or total revenue? Who's representing us for this week's telecom with Headquarters? Can we still add facilities to the list?

Using the rule of reason, the Postal Service has not initiated a search for such e-mails.