

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

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

Docket No. N2009-1

PUBLIC REPRESENTATIVE
FIFTH SET OF INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS TO UNITED STATES POSTAL SERVICE
WITNESS ALICE M. VANGORDER (PR/USPS-T1-14)

(September 2, 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-T1-14

Please refer to your August 31, 2009 revised response to PR/USPS-T1-11(a-c). Please define the terms “closed” (plus “close” and “closure”), “consolidated” (plus “consolidate” and “consolidation”), and “discontinue” (plus “discontinued” and “discontinuance”) as used in your response, and discuss and explain the similarities and difference between each term. For example, will every “closure” of a station or branch result in a “consolidation” of some type? Please explain.