

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

)
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 (PR/USPS-31-35)

(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. 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

901 New York Avenue, N.W.
Washington, DC 20268-0001
(202) 789-6827; Fax (202) 789-6891
e-mail: robert.sidman@prc.gov

PR/USPS-31

Please refer to your response to PR/USPS-19(b) where you state that “the station and branch discontinuance study process incorporates material from other Chapters of the PO-101.” Please identify the “material from other Chapters of the PO-101” that the Postal Service requires its employees to follow prior to closing or consolidating a branch or station.

PR/USPS-32

Please refer to your response to PR/USPS-19(c) where you state that the language from page 55 of PO-101 is a “brief summary, not a complete description of the District Manager’s responsibilities.” Please provide a complete description of the District Manager’s responsibilities as it relates closing or consolidating branches and stations under the requirements of PO-101 and the Initiative. Please provide all documents that support this description.

PR/USPS-33

Please refer to the Postal Service’s response to PR/USPS-21(d). Please confirm that the Postal Service intends to determine the “resulting *net* cost savings” (i.e., cost savings less costs incurred) associated with realigning the postal retail network. If not confirmed, please explain.

PR/USPS-34

Please refer to your response to APWU/USPS-T1-1(e), where it states that “There are currently approximately 42,100 5-digit ZIP Code areas in the postal network.” How many of the approximately 42,100 5-digit ZIP Code areas will see a closure or consolidation if all 677 stations or branches identified in USPS-LR-N2009-1/4 are closed or consolidated. Please update your response should the number of stations or branches identified in USPS-LR-N2009-1/4 be updated in subsequent filings.

PR/USPS-35

Please refer to your response to VP/USPS-T1-10 where you list the unit costs of selling stamps and collecting retail postage through various channels.

- a. Please identify the unit used for the unit cost in your response to VP/USPS-T1-10 (e.g, are those unit costs “per stamp,” “per transaction,” or some other unit of measurement?)

- b. Please provide a citation(s) to the source(s) for the figures provided in your response to VP/USPS-T1-10 if the figures were previously provided in electronic format in a prior Commission docket. If the figures were not previously provided in electronic spreadsheet format in a prior Commission docket, please provide electronic spreadsheets showing all calculations used to derive the figures provided in the response to VP/USPS-T1-10.