

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-31 THROUGH 35
(September 8, 2009)

The United States Postal Service hereby provides institutional responses to Public Representative interrogatories PR/USPS-31 through 35, which were filed on September 2, 2009. Each 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
TO INTERROGATORY OF THE PUBLIC REPRESENTATIVE**

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.

RESPONSE

The following references from the PO-101 are also guidelines that are used for the discontinuance of classified stations and branches.

1. Chapter 1: Sections 122, 131, 132.1 (d-f), 132.2, 133.32, 134.61, 134.62, 134.63 (a-d) 141, 143, 144, 145 (b-e, g-l, r-s, v-y), 146 (a-h; j, k, m)
2. Chapter 2: Sections 211, 212, 213.2, 213.3, 221 (a, b, d, e, g), 222 (a, b, d-e), 241, 242 (a-b-d), 243, 251, 252.21, 254, 255, 262-265, 271 (a-c), 272
3. Chapter 3: Sections 31 and 32 (a-f), 341.31
4. Chapter 4: Sections 423-424, 432.1 and 432.2, 433

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

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.

RESPONSE

In addition to information on Page 55 of Handbook PO-101, the District Manager is responsible for the following related to the Discontinuance of Classified Stations and Branches:

1. Submitting all requests to discontinue a classified station and branch to Headquarters;
2. Notifying Area Vice Presidents of proposed discontinuance;
3. Obtaining Area Vice President approval for elimination of ZIP Codes;
4. Providing written approval before investigation is initiated;
5. Notifying Headquarters of any factors that may warrant withdrawal of the proposal after a study has been sent to HQ for approval;
6. Defining the reasons and justification for the proposal;
7. Ensuring public notice and community input are solicited;
8. Evaluating and addressing the effect on employees and customers;
9. Reviewing and approving the proposal before sending it up the chain of command for review.

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

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.

RESPONSE

After making the various discontinuance decisions that result from pursuit of the SBOC Initiative, the Postal Service will be able to determine a cumulative cost savings estimate, as defined by the discontinuance review process, based on the data collected and reported as a part of each individual discontinuance study.

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

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.

RESPONSE

There are approximately 721 5-digit ZIP Codes that represent the 759 station/branches reflected in USPS Library Reference N2009-1/4 (September 2). The 413 identified as remaining under consideration represent approximately 401 5-digit ZIP Codes.

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

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.

RESPONSE

- a-b. Please see the revised response to VP/USPS-T1-10.