

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

STATION AND BRANCH OPTIMIZATION AND  
CONSOLIDATION INITIATIVE, 2009

Docket No. N2009-1

COMPELLED RESPONSES OF THE UNITED STATES POSTAL SERVICE  
TO DAVID POPKIN INTERROGATORIES DBP/USPS-9-10  
(September 10, 2009)

The United States Postal Service hereby provides its compelled responses to the above-listed institutional interrogatories of David Popkin, filed on July 13, 2009, in accordance with Presiding Officer's Ruling No. N2009-1/2, issued on September 1, 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  
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**DBP/USPS-9** For each level of the Postmaster, please provide a listing of the breakdown of the number of post offices and number of subordinate stations and branches in that level.

**RESPONSE**

In accordance with Presiding Officer's Ruling No. N2009-1/2, the following information is provided:

- EAS-24: Average of four units which include the main post office, and stations and/or branches that report to the main post office.
- EAS-23: There are no EAS-23 level post offices. The next level under an EAS-24 would be an EAS-22.
- EAS-22: Average of two units that include the main post office and stations and/or branches that report to the main post office.

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**DBP/USPS-10** Please describe in detail how the level of the Postmaster is determined including the specifics of the values that go into ranking a post office at Level 24 or higher.

**RESPONSE**

In Presiding Officer's Ruling No. N2009-1/2, the Commission states that

The characteristics of what constitutes an EAS-24 level Postmaster from the perspective of geographic location (urban, suburban, rural), population or density of population, revenue, number of employees, number of subordinate stations and branches under jurisdiction, etc., appear relevant to the makeup of the potential station and branch pools. For comparison purposes and because of the potential to expand this Initiative to lower EAS levels, a similar description for the next lower Postmaster pay grade also may be helpful and should be provided in the response to this interrogatory.<sup>1</sup>

The determination of a Postmaster's EAS level is primarily driven by the responsibility handled by that Postmaster. A number of factors are weighed, and a point total is determined. That point total determines the Postmaster's EAS level. Factors taken into consideration include the number of general delivery families served, post office boxes/call boxes rented, possible city deliveries, rural boxes served, the administrative responsibilities handled by the Postmaster, the number of stations, branches, contract stations/branches, and community post offices supervised by the Postmaster, the seasonal workload for the office, mail processing handled by the office, and other services performed by the office. Accordingly, the characteristics of an EAS-24 or an EAS-23 level Postmaster position cannot be stated solely on the basis of geographic location, population or density of population, revenue, number of employees, number of subordinate stations and branches under jurisdiction, etc.

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<sup>1</sup> Presiding Officer's Ruling No. N2009-1/2.

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Higher Postmaster pay grades indicate higher levels of responsibility. As a general rule, Postmasters at the EAS-24 level are likely to be supervising multiple stations and branches in urban and suburban areas, with the likelihood that some will be in relative close proximity to one another.

The purpose of the Station and Branch Consolidation Initiative (“Initiative”) is to identify opportunities for retail optimization and consolidation. The Initiative is focused on urban and suburban areas because these areas have the greatest likelihood of retail facilities in close proximity to one another, which are likely to present themselves as logical candidates for discontinuance review with the least adverse impact on customers. Descriptors such “urban and suburban” or “in close proximity” are vague and open to varying interpretations. Accordingly, the Postal Service used the EAS-24 level as a way to begin to specify the universe of facilities to be studied in the Initiative. Because the EAS-24 and above designation, by itself, only broadly identifies candidate facilities within the scope of the Initiative, it is only a starting point. The pre-screening criteria were established to more clearly identify stations and branches that could be candidates for consolidation. It is the pre-screening criteria that truly determine the makeup of the potential station and branch pools.

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The Initiative is now focused only stations and branches within the EAS-24 level that fit the criteria of the Initiative. Lower EAS levels will not be implicated in this Initiative.