

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

STATION AND BRANCH OPTIMIZATION AND
CONSOLIDATION INITIATIVE, 2009

Docket No. N2009-1

OPPOSITION OF THE UNITED STATES POSTAL SERVICE TO
POPKIN MOTION TO COMPEL RESPONSE TO INTERROGATORIES
DBP/USPS-31
(September 17, 2009)

On July 27, 2009, the Postal Service filed an objection to providing a response to the above listed interrogatory. On August 10, 2009, Mr. Popkin filed a motion to compel a response. The Postal Service hereby opposes that motion. The interrogatory in question is reprinted in bold below. An explanation of why the motion should be denied follows.

DBP/USPS-31 It would appear that the Postal Service has either instituted or is considering institution of summer hours for retail window service hours. This would result in the reduction of retail window service hours and/or lobby access hours at some post offices, including stations and branches of some post offices, during the summer time frame and perhaps beyond.

Please furnish details of any such programs that have been or are being planned at the Area level or above. Please also furnish copies of any memoranda or directives that have been issued at the Area level or above which are related to the temporary or permanent reduction in retail window service hours and/or lobby access hours.

The Postal Service opposes Mr. Popkin's motion to compel a response to this interrogatory because, this interrogatory seeks information that is beyond the scope of the SBOC Initiative, and as stated before, will not lead to the discovery of admissible evidence. Mr. Popkin's allegation that "one of the possible actions taken with respect to

a station or branch of a level 24 or above facility [as a result of efforts made in this Docket] could be the reduction of retail window service hours and/or lobby access hours”¹ is incorrect. The purpose of the Station and Branch Consolidation Initiative (“SBOC Initiative”) is to examine whether the retail postal network can be optimized by reducing the number of stations and/or branches in the network. The only actions that will result from the Initiative is a determination that a particular station or branch remain open or be discontinued. Any alleged program to institute summer hours for retail window services is not part of the SBOC Initiative, because the scope of the SBOC Initiative is only to determine whether a station or branch should remain open or be discontinued – not whether its hours should be reduced.

The goal of the SBOC Initiative is not to provide retail service at less cost by reducing retail hours, but to provide service at less cost by eliminating some retail locations. One does not optimize the number of stations and branches in the postal retail network by reducing their operating hours any more than one optimizes the number of jets in a fighter squadron by reducing the hours that pilots fly each week.

Moreover, as stated in the Request, any changes in service would not be implemented before October 2, 2009. Therefore, any program concerning the institution of summer hours for retail window service would again, not be relevant to the Initiative. The decision to close a facility would not rest on a temporary seasonal reduction of hours. As such, Mr. Popkin should not be allowed to abuse this Docket, and waste both the Postal Service’s and the Commission’s valuable time, with requests for information about programs that, to the extent that they even exist, are patently unrelated SBOC

¹ David B. Popkin Motion to Compel Response to Interrogatory DBP/USPS-31 at 2 (August 10, 2009).

Initiative.

This response is not inconsistent to the response given to DBP/USPS-30.² The responses given to DBP/USPS-30(a-b) and (c) must be read together. In the evaluation of a specific station or branch of Level 24 or higher post office, the Postal Service is not limited to one of two choices. The present focus is the SBOC Initiative, which determines whether the station or branch should remain open or be discontinued. Once the decision is made to keep a facility open, further local evaluations, *beyond the scope of the SBOC Initiative*, could consider a variety of options for that facility. These types of routine evaluations are not part of the SBOC Initiative or adjunct to it. Rather, they are performed as part of local management's never-ending responsibility to consider adjustments in local retail operating plans to provide access to retail service in an efficient and economical manner.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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² Response of United States Postal Service to David Popkin Interrogatory DBP/USPS-30 (August 6, 2009).