

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

STATION AND BRANCH OPTIMIZATION AND  
CONSOLIDATION INITIATIVE, 2009

Docket No. N2009-1

COMPELLED RESPONSE OF  
UNITED STATES POSTAL SERVICE WITNESS MATALIK TO  
AMERICAN POSTAL WORKERS UNION INTERROGATORY APWU/USPS-T2-3(c)  
(September 21, 2009) [ERRATA]

In accordance with Presiding Officer's Ruling No. N20009-1/4, the United States Postal Service hereby provides the responses of witness Matalik to the following interrogatory of the American Postal Workers Union: APWU/USPS-T2-3(c). The interrogatory is stated verbatim and followed by the response. By operation of Presiding Officer's Ruling No. N2009-1/4, the Postal Service is not obliged to respond to APWU/USPS-T2-3(a-b). Responses to subparts (d-e) were filed on August 12, 2009. Those responses are taken verbatim and combined with the compelled response to subpart (c) filed today. Accordingly, the August 12, 2009, responses to APWU/USPS-T2-3(d-e) are superseded by today's filing.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:  
Daniel J. Foucheaux, Jr.  
Chief Counsel, Pricing and Product Support

\_\_\_\_\_  
Michael T. Tidwell  
Attorney

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2998; Fax -5402  
michael.t.tidwell@usps.gov

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MATALIK  
TO INTERROGATORY OF AMERICAN POSTAL WORKERS UNION  
Revised; September 21, 2009**

**APWU/USPS-T2-3**

On page 7, Table 1 of your testimony you provide the number of station and branch closures during the past four fiscal years.

- a.) Please provide the number of discontinuance review studies that were performed on station and branches each year during FY2005-FY2008.
- b.) Please provide the number of consolidation review studies that were performed on station and branches each year during FY2005-FY2008. How many of these studies resulted in a consolidation?
- c.) You specifically state in footnote 4 that not all of the facilities in this group would be classified as facilities that report to EAS-24 (and above) Postmasters. Please provide a count of the studies done during this time period of facilities that report to EAS-24 (and above) Postmasters and the number of closures of facilities in this group.
- d.) The response to DBP/USPS-13 indicates that the Library References USPS-LR-N2009-1/1 and USPS-LR-N2009-1/2 were chosen because they were conveniently on top of a nearby filing cabinet. Would either of the facilities in the library references be an example of the facilities that are being considered for consolidation in this case?
- e.) If neither are representative of the type of facilities in this case, would you consider the issues addressed in these two library references as being indicative of the issues that will be in the type of consolidations being considered in this case?

**RESPONSE**

- (a-b) [No response required by Presiding Officer's Ruling No. N2009-1/4.]
- (c) 15 of the 21 stations/branches referred to in revised Table 1 of my testimony fit this classification.
- (d-e) No. The Library References represent nothing more than examples of the application of the station/branch discontinuation process. The documents were provided to give a better sense of the review process and the sorts of documents that are compiled as part of that process and forwarded to Headquarters. The files have not been reviewed to determine whether the substantive issues faced in those cases bear any resemblance to the issues likely to be faced as part of the SBOC Initiative. Neither file was

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MATALIK  
TO INTERROGATORY OF AMERICAN POSTAL WORKERS UNION  
Revised; September 21, 2009**

**RESPONSE to APWU/USPS-T2-3 (continued)**

selected on the basis of whether it reported to an EAS-24 and above Postmaster in one of the cities listed in the attachment to the request in this docket, or as typical or representative of such facilities. Without a comprehensive facility-specific analysis of the category as a whole, it would be difficult to know whether any one or two EAS-24 and above stations and branches could be considered typical or representative. The files happened to be in my workspace as the request was being prepared. Other similar files are located at a remote storage facility. The choice was between providing the files that were readily available as samples of the discontinuance review process or making a trip to that facility to randomly or otherwise select other files.