

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

STATION AND BRANCH OPTIMIZATION AND  
CONSOLIDATION INITIATIVE, 2009

Docket No. N2009-1

REVISED RESPONSES OF UNITED STATES POSTAL SERVICE  
WITNESS VANGORDER  
TO VALPAK INTERROGATORIES VP/USPS-T1-8(b) AND (c)  
(September 21, 2009) [ERRATA]

The United States Postal Service hereby provides the revised responses of witness VanGorder to the following interrogatory of Valpak: VP/USPS-T1-8(b) and (c).

The revised response to VP/USPS-T1-8 filed today updates her answer to subpart (b), corrects her answer to subpart (c), and incorporates her unchanged answers to subparts (a) and (d) through (g). Accordingly, the response to T1-8 filed today supersedes in its entirety the original answer filed on August 25, 2009. The interrogatory is stated verbatim and followed by the revised response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS VANGORDER  
TO VALPAK INTERROGATORY**

**Revised: September 21, 2009**

**VP/USPS-T1-8.**

Please refer to your testimony at p. 5, fn. 1, where you describe a “fourth option, contract postal units (CPUs).”

- a. Is a contract postal unit considered to be (i) a postal retail location, or (ii) a nonpostal retail location?
- b. Please refer to your testimony, fn. 4 on p. 5 and ll. 3-7 on p. 9. Of the “nearly 4000 CPUs” mentioned in footnote 4, approximately how many are located within or in close proximity to the areas served by “that portion of the retail network consisting of stations and branches that report to Postmasters at or above the USPS Executive & Administrative Schedule level 24 (EAS-24) pay grade,” as described on page 1 of the Request.
- c. Do those contract postal units that are located in “denser population centers” provide all essential services as defined in your response to VP/USPS-T1-6? Unless your answer is an unqualified affirmative, please explain in what respects the services provided by CPUs in denser population centers — *i.e.*, those CPUs that may be considered by customers as an option to the stations or branches included for consideration as part of this Initiative — differ from those essential services provided by a regular station or branch.
- d. For those contract postal units that are located in “denser population centers,” please discuss the number of days a week they usually are open, including Saturdays and Sundays, and what restrictions or requirements the Postal Service places on those CPUs with respect to days of operation.
- e. For those contract postal units that are located in “denser population centers,” please discuss the number of hours a day they usually are open, including evenings and on Saturdays and Sundays, and what restrictions or requirements the Postal Service places on those CPUs with respect to hours of operation.
- f. Are those contract postal units located in “denser population centers” also subject to study for possible closure and consolidation as part of the Initiative described by your testimony and in the Request?
- g. After the Postal Service has determined that a station or branch should be closed and consolidated with another nearby station or branch (as a result of this Initiative, say), please discuss whether the Postal Service then would consider offering a private parties (*e.g.*, via a competitive RFP) the opportunity to open a CPU in the neighborhood of the closed station or branch.

**RESPONSE**

- a. (i) Yes.
- (ii) No.

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TO VALPAK INTERROGATORY**

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**RESPONSE to VP/USPS-T1-8 (continued)**

- b. I am informed that 125 of the 677 stations and branches initially listed in USPS Library Reference N2009-1/4 have a CPU in the same 5-digit ZIP Code area. The corresponding figures for the September 2<sup>nd</sup> revision to that Library Reference would be 159 of 759.
- c. No. Most CPU's generally provide the same services as a Post Office, with the exception of passport application, bulk and permit mail acceptance; Post Office boxes, or general delivery.
- d. I am informed that CPU locations are open five days a week, Monday-Friday; some on Saturday and Sunday.
- e. I am informed that most CPU locations are open on average 9 hours per day, some as much as 12, and a few offer 24 hour service. At a minimum we expect CPUs to provide service for the same amount of hours as the host Post Office. We also expect the CPU will be open for the same hours as the host CPU location's main business.
- f. No. The Initiative is focused on stations and branches that report to EAS-24 and above Postmasters.
- g. CPUs are not being considered as replacements for a closed station or branch as part of or in conjunction with this Initiative. Local management is responsible for routinely assessing customer needs. In any given location where a station or branch is closed or consolidated as part of this Initiative, it is expected that future assessments of customer needs by local

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**RESPONSE to VP/USPS-T1-8 (continued)**

management could include consideration of a variety of reasonable options, including the feasibility of reestablishment of a station/branch and promotion of various alternative access channels, including CPUs.