

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

STATION AND BRANCH OPTIMIZATION AND  
CONSOLIDATION INITIATIVE, 2009

Docket No. N2009-1

REVISED RESPONSE OF UNITED STATES POSTAL SERVICE  
WITNESS VANGORDER  
TO PUBLIC REPRESENTATIVE INTERROGATORY PR/USPS-T1-3  
(September 21, 2009) [ERRATA]

The United States Postal Service hereby provides the revised responses of witness Alice VanGorder to subparts (a) and (b) of interrogatory PR/USPS-T1-3. The revisions clarify the original answers to subparts (a) and (b). The interrogatory is stated verbatim and followed by the response. This revised response supersedes the answer filed on August 17, 2009.

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 VANGORDER  
TO INTERROGATORY OF THE PUBLIC REPRESENTATIVE**

**Revised: September 21, 2009**

**PR/USPS-T1-3**

Your testimony discusses that in recent years Automated Postal Centers (APCs) have been installed in postal retail lobbies. USPS-T-1 at 7.

- a. If a customer's closest branch or station currently has an APC, please explain how the potential closure of this branch or station is mitigated by the existence of that APC?
- b. Does the Postal Service plan on replacing customers' branches or stations with APCs?

**RESPONSE**

- a. My testimony does not suggest any such mitigation. If a customer's closest station or branch were closed, the APC usually would not remain at the discontinued location. Instead, it usually would be relocated to Post Office, station or branch whose demographics and revenue potential indicated the need for the displaced APC. That could include that particular customer's nearest remaining Post Office, station or branch.
- b. No such plan exists, but local proposals for such arrangements may be implemented.