

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

STATION AND BRANCH OPTIMIZATION AND  
CONSOLIDATION INITIATIVE, 2009

Docket No. N2009-1

OBJECTIONS OF THE UNITED STATES POSTAL SERVICE TO  
DAVID POPKIN INTERROGATORIES DBP/USPS-40, 41, and 43(b).  
(September 21, 2009)

In accordance with Rule 26(c) of the Postal Regulatory Commission's Rules of Practice and Procedure, the United States Postal Service hereby files the following objections to the above-listed interrogatories submitted by David Popkin on September 9, 2009. Each interrogatory is reprinted below, with the reasons for objecting following.

**DBP/USPS-40**                    **Please refer to your response to Interrogatory DBP/USPS-28. Please confirm, or explain if you are unable to confirm, that the final collection time at the blue collection box located at the facility should be based on the final trip to the Processing Center including any trip which is utilized for dispatch of mail collected by delivery carriers along their route.**

The Postal Service objects to this interrogatory because it is irrelevant to the issues raised by the request in this docket. This docket concerns a Postal Service plan to optimize its retail network by reducing the number of certain retail facilities. The Station and Branch Optimization and Consolidation Initiative ("Initiative") does not focus on, nor will the results of the Initiative affect, final collection box times, or the dispatch of collection mail to processing and distribution centers.

**DBP/USPS-41** Please refer to your response to Interrogatory DBP/USPS-28. Please confirm, or explain if you are unable to confirm, that

1. Scans are made when scheduled collections are made at blue collection boxes and lobby drops.
2. These scans are evaluated and if a collection is missed or made early, an employee will be dispatched to that collection point.
3. Mail which is collected will then be brought to the Processing Center to receive the same dispatch it would have had it been properly collected.

If you cannot confirm the above procedure taking place at all facilities, please provide the best estimate of the extent to which it does take place.

The Postal Service objects to providing a response to this interrogatory because it is irrelevant to the issues raised by the request in this docket, and it is improper follow-up.

This docket concerns a Postal Service plan to optimize its retail network by reducing the number of certain retail facilities. The Station and Branch Optimization and Consolidation Initiative (“Initiative”) does not focus on, nor will the results of the Initiative affect, scanning and collection practices at blue collection boxes and lobby drops.

**DBP/USPS-43** Please refer to your response to Interrogatory DBP/USPS-29. Your response is not clear as to whether the origin Post Office will utilize the current time [the time that the carrier presents the mail to the acceptance clerk] or will, in effect, be backdated to the time the customer gave the mail to the carrier.

[a] Please clarify your response.

[b] What time and corresponding delivery standard is utilized on Express Mail collected from a blue Express Mail collection box? Please advise whether the origin Post Office will utilize the current time [the time that the carrier presents the mail to the acceptance clerk] or will, in effect, be backdated to the time shown on the blue collection box.

#### **RESPONSE:**

The Postal Service objects to providing a response to part (b) interrogatory because it is irrelevant to the issues raised by the request in this docket. This docket concerns a Postal Service plan to optimize its retail network by reducing the number of certain retail

facilities. The Station and Branch Optimization and Consolidation Initiative (“Initiative”) does not focus on, nor will the results of the Initiative affect, Express Mail collection box practices.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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