

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

STATION AND BRANCH OPTIMIZATION AND  
CONSOLIDATION INITIATIVE, 2009

Docket No. N2009-1

INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS  
DIRECTED BY THE UNITED STATES POSTAL SERVICE  
TO APWU WITNESS ANITA MORRISON  
(October 29, 2009)

Pursuant to rules 25 and 26 of the Rules of Practice and Procedure, the  
United States Postal Service hereby directs the following interrogatories and requests  
for the production of documents to American Postal Workers Union witness

Anita Morrison (APWU-T-2):

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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### **USPS/APWU-T2-1**

Please indicate the date on which you were first contacted by a representative of APWU for purposes of considering the preparation of analysis and testimony in this docket and the date on which you were contracted to do so.

### **USPS/APWU-T2-2**

Please refer to lines 1 through 3 of (unnumbered) page 5 of your testimony where you describe its purpose and scope. There you state that the purpose of your testimony is to determine “if there was evidence that the process used was adversely impacting low income, elderly and/or minority persons.”

- (a) Is it your testimony that the discontinuance of operations at postal retail stations and branches has no adverse impact upon persons who are not low-income, or not elderly or not members of a racial or ethnic minority?
- (b) Do the data, analysis and conclusions in APWU-T-2 and its Appendix A regarding the impact of the Station and Branch Optimization and Consolidation (SBOC) Initiative on low income, elderly and/or minority persons reflect all of the data and analysis conducted, and all of the conclusions considered in connection with the preparation of your testimony? If not, please explain and provide all documents reflecting any alternative data, analyses and conclusions not included in APWU-T-2 or Appendix A.
- (c) Did you perform any analysis or reach any conclusions regarding any adverse impact on postal customers resulting from the process used to pre-screen the total universe of SBOC candidate stations and branches to identify the 759 candidates for further study listed in the September 2, 2009 revision to USPS Library Reference N2009-1/4? If not, why not? If so, please provide all documents reflecting all such analysis and conclusions.
- (d) Did you perform any analysis or reach any conclusions regarding any adverse impact on postal customers resulting from the process that reduced the number of candidate facilities under consideration from 759 to 413, as reflected in the September 2, 2009 revision to USPS Library Reference N2009-1/4? If not, why

not? If so, please provide all documents reflecting all such analysis and conclusions.

- (e) Please confirm that it is your understanding that the reduction from 413 to 371 in the number of stations and branches still under consideration occurred between September 2nd and October 9<sup>th</sup>, 2009. If you do not confirm, please explain the basis for any contrary understanding.

### **USPS/APWU-T2-3**

Please refer to APWU-T-2 page 6, lines 4-5. Please confirm whether the “areas surrounding the listed stations and branches” are the “close in” service areas referenced later in lines 8-9. If not confirmed, please explain. Please define or describe the portion of the service area of a station or branch that is not “close in.”

### **USPS/APWU-T2-4**

Please refer to APWU-T-2 at page 6, lines 8 through 11. There you describe the use of the street address of a postal retail station for the purpose of defining its “close in service area” as the one-half mile radius around that station.

- (a) For the stations analyzed in your testimony on average, what percentage of the walk-in customers who utilize that station:
  - (i) live or work within one-half mile of it?
  - (ii) live or work within the remainder of its service area, as defined in response to USPS/APWU-T2-3?
- (b) Please describe all analysis performed and provide all supporting documentation in connection with the assertion at line 10 of page 6 that patrons within this one-half mile radius are “most dependent on the physical facility,” compared to patrons within the service area of the station who live or work outside the one-half mile radius, but are
  - (i) within a ¾-mile radius;
  - (ii) within a one-mile radius.
- (c) Please describe all analysis performed and provide all supporting documentation in connection with the assertion at lines 10-11 of page 6 that patrons within this

one-half mile radius are “most likely to utilize the facility,” compared to patrons within its service area of the station who live or work outside the one-half mile radius, but are

- (i) within a ¾-mile radius;
  - (ii) within a one-mile radius.
- (d) Please describe and provide the results of all analysis performed in connection with APWU-T-2 which utilized any service area definition other than a ½-mile radius (for example, any radii referenced in subparts (b) and (c), any areas defined by ZIP Code boundaries, or any other you utilized).

### **USPS/APWU-T2-5**

Please describe all surveys or interviews conducted in connection with the preparation of your testimony that were designed to gather information from postal patrons, including any who are low income, elderly and/or members of racial/ethnic minorities. Please provide copies of all survey instruments and all data regarding the nature and quantities of postal retail transactions these patrons conduct that were collected as part of any such effort. Please provide any analysis conducted in connection with APWU-T-2 that compares these patrons to any baseline group. In providing any such data, please differentiate between patrons who live or work within a half-mile of a postal retail station and those who do not.

### **USPS/APWU-T2-6**

At page 4, lines 12 through 15, you describe various client groups with whom Partners for Economic Solutions (PES) has worked “extensively” to bring “real estate and economics expertise to bear on a wide range of urban development and public policy issues.” Appendix B of APWU-T-2 indicates that you have been affiliated with PES since September 2008.

- (a) Please specifically list the clients of PES described at lines 12 through 15 of page 4, to the extent that they are not listed in the first paragraph of your autobiographical sketch.

- (b) With respect to each specific PES client, please list and describe the urban development and public policy issues referenced at page 4, to the extent that they are not listed and described in the first paragraph of your autobiographical sketch.
- (c) Please provide copies of all written testimonies or reports authored by you since the year 2000 and presented before any public agencies on behalf of any PES or other clients.

### **USPS/APWU-T2-7**

Please provide all studies, and analysis thereof, undertaken in connection with APWU-T-2 that relate to the impact of automobile ownership and/or access to public transportation on the ability of postal patrons to:

- (a) shop at grocery or other retail stores and pharmacies,
- (b) to conduct banking transactions,
- (c) to commute to and from work, and/or
- (d) otherwise conduct routine life activities that generally require leaving one's abode.

Please provide all data generated by all such studies, surveys or interviews.

### **USPS/APWU-T2-8**

Please provide all studies, and analysis thereof, undertaken in connection with APWU-T-2 that relate to the relative burdens experienced by postal patrons seeking access to retail Post Offices, stations or branches that address, in any way, patrons' status as the member of a racial or ethnic minority. Please provide all data generated by all such studies, surveys or interviews.

### **USPS/APWU-T2-9**

Assume, hypothetically, that you were responsible for making an unavoidable decision that required you to maintain an adequate level of service while reducing by one the number of postal retail stations or branches within the service area of a Post Office. Also assume that, in carrying out that solemn responsibility, you were limited to

consideration of only:

- (a) perfect and complete data concerning actual use of that facility by customers and the services provided to them from that facility; or
- (b) perfect and complete demographic data concerning age, income level and racial/ethnic minority status or persons who lived within ½ mile of the facility.

On which set of data would you prefer to rely? Please explain your response.

### **USPS/APWU-T2-10**

Please provide all studies, and analysis thereof, undertaken in connection with APWU-T-2 that relate to the relative burdens experienced by postal patrons seeking access to retail Post Offices, stations and branches that address any one or more socioeconomic factors, including postal patron racial/ethnic minority status, income and age. Please provide all data generated by all such studies, surveys or interviews.

### **USPS/APWU-T2-11**

Please refer to APWU-T-2 at page 15, lines 16-19. Please provide your understanding of the extent to which non-postal money orders can be purchased at non-postal retail locations.

### **USPS/APWU-T2-12**

Please confirm that your testimony does not sponsor, explain or provide access to the survey methodology or results referenced at APWU-T-2, from page 15, line 28 to page 16, line 1.

### **USPS/APWU-T2-13**

Please explain your understanding of whether [www.usps.com](http://www.usps.com) is accessible via broadband Internet exclusively or whether it is also meaningfully accessible via dial-up Internet service.

#### **USPS/APWU-T2-14**

In APWU-T-2, in the text on page 16, lines 6-8, you paraphrase a passage from an online newspaper article that appears to summarize research which appears in a book referenced at page 16, n.7. Please provide citations to the page(s) in the book that discuss the research referenced by the newspaper reporter.

#### **USPS/APWU-T2-15**

Please refer to APWU-T-2, page 20, lines 9-11. If the Postal Service were to adopt the policy that you state should be required, how many additional postal retail facilities would need to be established in each of the 5-digit ZIP Code service areas where the 413 stations and branches identified in October 9, 2009 version of USPS Library Reference N2009-1/4 are located?

#### **USPS/APWU-T2-16**

Please refer to APWU-T-2, Appendix A. To what period of time do the unemployment rates depicted in the final column relate? To what extent have those rates increased over the same period:

- (a) one year earlier;
- (b) two years earlier.

#### **USPS/APWU-T2-17**

Please refer to APWU-T-2, page 12, lines 12-13.

- (a) Please define “business district” as you use the term in your testimony.
- (b) Please provide copies of all economic studies and analysis that you have read, performed, or reviewed, which support the assertion that postal stations and branches “anchor many business districts across America” and that quantify the economic impact the presence of a postal station or branch has on a business district.

- (c) Please cite any examples and supporting analyses for the conclusion that any specific business district would not exist but for the presence of a postal station or branch.

### **USPS/APWU-T2-18**

Please refer to APWU-T-2, page 7.

- (a) At lines 8-9, you reference a \$20,000 annual household income benchmark. Why was this figure selected?
- (b) Did you perform any analysis based on one or more different annual household income figures? If so, please describe the analysis or each and provide any data generated in connection with the consideration of each alternative.
- (c) Did you consider performing any analysis based on a different benchmark or income range. If not, why not?
- (d) At lines 12-14, you indicate that 9 percent of households have incomes below \$20,000 compared with 12 percent of households within ½-mile of certain postal facilities. Did you perform any analysis based on one or more different radii of those facilities (for example, ¾-mile or 1-mile)? If so, please provide and describe data generated by all such analyses.
- (e) Are the 9 percent of the population referenced at lines 12-14 randomly distributed across the United States?

### **USPS/APWU-T2-19**

At APWU-T-2, page 7, lines 20-21 you assert the creation of an “undue” burden on low-income residents by the Station and Branch Optimization and Consolidation Initiative.

- (a) Please fully describe the level of “not undue” or “due” burden it would be reasonable for the residents of household with \$20,000 annual income to bear.
- (b) Please fully describe the level of “not undue” or “due” burden that it would be reasonable for residents of household with \$30,000 annual income to bear.
- (c) Please fully describe the level of “not undue” or “due” burden that it would be reasonable for residents of household with \$40,000 annual income to bear.

- (d) Please fully describe the level of “not undue” or “due” burden that it would be reasonable for residents of household with \$60,000 annual income to bear.
- (e) Please fully describe the level of “not undue” or “due” burden that it would be reasonable for residents of household with \$100,000 annual income to bear.
- (f) Please describe the process or algorithm that enables you to evaluate “due” and “undue” burden and distinguish one from the other.
- (g) Please provide citations to authoritative or other peer reviewed sources that support your answers to each part of this interrogatory.

**USPS/APWU-T2-20**

Please refer to APWU-T2, page 18, lines 15-16 and 30-32. Please identify the socioeconomic groups discussed in your testimony who, in your opinion, could be disadvantaged by an increased reliance by the Postal Service on web-based communications tools?

**USPS/APWU-T2-21**

Please refer to APWU-T-2, page 18, lines 8-9. Please explain the basis for your assertion that all postal customers seeking to respond to paper surveys are required to request a form from a postal clerk and that no such forms are available on retail lobby tables or counters.

**USPS/APWU-T2-22**

Please refer to APWU-T-2, page 17, lines 10-20. Please confirm that the statistics obtained from the National Complete Streets Coalition are based upon a survey of persons throughout the United States and are not focused on persons residing in proximity to the 413 postal stations and branches that serve as the focus of a portion of your testimony.

**USPS/APWU-T2-23**

Please summarize the extent of your knowledge concerning the general relationship

between the level of household income and the level of postal retail transactions generated by a household.

**USPS/APWU-T2-24**

Please refer to APWU-T-2, page 13, lines 15-16. Would you agree that the convenience of alternative channels through which postal customers can obtain postal products and services (for example, the purchase of postage stamps at consignment locations, the ability to conduct postal retail transactions at [www.usps.com](http://www.usps.com), and the ability to transact postal business at contract postal units, as described in USPS-T-1) is “a critical factor in . . . [the Postal Service’s ability] to compete for customers and operate profitably.” If not, please explain.

**USPS/APWU-T2-25**

Please refer to APWU-T-2, page 13, lines 26-28. Please estimate the percentage residential postal customers who make daily visits to postal retail facilities. Please provide the basis for your estimate. Please estimate the frequency with which such postal customers generally visit other retailers or institutions. Please identify those institutions and provide the basis for your frequency estimates.