

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

**Station And Branch Optimization And : Docket No. N2009-1
Consolidation Initiative, 2009 :**

**RESPONSE OF AUSPL WITNESS MARIO PRINCIPE (AUSPL-T-1)
TO INTERROGATORIES AND REQUEST FOR
PRODUCTION BY THE UNITED STATES POSTAL SERVICE
TO AUSPL WITNESS MARIO PRINCIPE (USPS/AUSPL-T-1-6)
(November 2, 2009)**

The Association of United States Postal Lessors (AUSPL) hereby submits the responses of witness Mario Principe to the following interrogatories and request for production of the United States Postal Service: USPS/AUSPL-T-1-6, filed on October 21, 2009.

Each interrogatory is stated verbatim and followed by the response.

Respectfully Submitted,

Robert Kapusta
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**RESPONSES OF AUSPL WITNESS MARIO PRINCIPE
TO INTERROGATORIES AND REQUEST FOR PRODUCTION
OF UNITED STATES POSTAL SERVICE**

USPS/AUSPL-T1-1

Please refer to page 5, lines 43-45 of your testimony, as well as USPS Library Reference N2009-1/4 (as revised October 9, 2009).

a. Please list and describe the various postal operations referenced on page 5, line 45 of your testimony.

Response:

Stations, branches, post offices, carrier annexes, mail processing centers, and vehicle maintenance facilities.

b. Please explain the basis for and provide documentation supporting the estimate of lines 44-45 of page 5 that AUSPL members lease 40 percent of the space utilized by the Postal Service to house these various operations.

Response:

I indicated in my statement that AUSPL has 3,300 members who lease (approximately 33,500,000 square feet) space to the Postal Service, and we provide approximately 40 percent of **leased** space used to house various postal operations nationwide. At that time, a USPS representative told us the Postal Service leased 97 million square feet. Today, another USPS representative said the Postal Service **leases** 105,012,925 square feet. USPS pays \$950 million in annual rent.

c. Please identify which of the postal facilities listed in USPS Library Reference N2009-1/4 are leased to the Postal Service by members of AUSPL.

Response:

1. Vet Adm Finance, Dayton, OH
2. Canton Deuber, Canton, OH
3. Akron East Akron, Akron, OH
4. Akron Maple Valley, Akron, OH
5. Youngstown Southside Station, Youngstown, OH
6. Southwest Station, Oklahoma City, OK
7. POR-Solomon, Portland, OR
8. Neville Island Branch, Neville Island, PA
9. Kno-Norwood Fsta, Knoxville, TN
10. MEM-White Station, Memphis, TN
11. CHA-East Lake Station, Chattanooga, TN

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12. JAC-Bemis Station, Jackson, TN
13. Ari-Great Southwest, Arlington, TX
14. Irving Downtown, Irving, TX
15. Cresthaven, San Antonio, TX
16. Station A, San Antonio, TX
17. MGY-Boylston, Montgomery, AL
18. MGY-Capitol Heights Station, Montgomery, AL
19. MOB-Chickasaw Fin, Mobile, AL
20. Pleasant Ridge Station, Little Rock, AR
21. Tucson Midtown, Tucson, AZ
22. Dimond, Oakland, CA
23. Kaiser Center, Oakland, CA
24. Niles, Fremont, CA
25. Oakland Station B, Oakland, CA
26. San Pablo Branch, San Pablo, CA (This is in Richmond, CA, but listed as San Pablo, CA)
27. Vallejo Station A, Vallejo, CA
28. Cole Branch, Los Angeles, CA
29. Market Station, Los Angeles, CA
30. Morningside Pk Station, Inglewood, CA
31. N Inglewood Station, Inglewood, CA
32. Stockton Tuxedo Park, Stockton, CA
33. George Washington, San Diego, CA
34. North Park Retail, San Diego, CA
35. IRV-East Irvine Station, Irvine, CA
36. LBC-No Long Beach, Long Beach, CA
37. RC-Etiwanda, Rancho Cucamonga, CA
38. SNA-Diamond Station, Santa Ana, CA
39. PNS-Downtown Station, Pensacola, FL
40. MBH-Surfside Branch, Surfside, FL
41. MIA-Goulds Fsta, Miami, FL
42. ORL-Arthur Kennedy Station, Orlando, FL
43. ORL-Pine Hills Branch, Orlando, FL
44. SAR-Southgate Station, Sarasota, FL
45. SPT-Central Station, Saint Petersburg, FL
46. ATL-Eastwood, Atlanta, GA
47. Capitol Station-Charleston, Charleston, WV
48. Spring Hill Station, South Charleston, WV
49. Silver Spring Center, Silver Spring MD
50. Detroit-Harper-Station, Detroit, MI
51. Flint-Cody Station, Flint, MI

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52. East 14th Retail-Des Moines, Des Moines, IA
53. Fort Wayne-Waynesdale-Fin Station, Fort Wayne, IN
54. Gary-Downtown Finance-Fin Station, Gary, IN
55. Gary-Miller-Station, Gary, IN
56. Indianapolis-West Indianapolis Fin Station, Indianapolis, IN
57. South Bend Olive Street Station, South Bend, IN
58. Kck-Fairfax, Kansas City, KS
59. Saint Louis-Baden-Fin Station, Saint Louis, MO
60. Saint Louis-Berkeley-Branch, Saint Louis, MO
61. Saint Louis-Soulard-Fin Station, St Louis, MO
62. Lnk-Woods Park Station, Lincoln, NE
63. Oma-Station B, Omaha, NE
64. Trenton Chambersburg (F), Trenton, NJ
65. Lic Pp Annex, Long Island City, NY
66. ALB-Patnoon, Albany, NY
67. Buffalo-Broadway Fillmore Station, Buffalo, NY
68. Buffalo-Lackawanna Branch, Buffalo, NY
69. Newton Branch, Cincinnati, OH

d. Please indicate the number of properties leased to the Postal Service by the ten AUSPL members with the highest number of such leaseholds.

Response:

- | | |
|---------------------------|-----|
| 1. Lawrence Magdovitz | 900 |
| 2. Leonard Spodak | 373 |
| 3. Frall Developers, Inc. | 205 |
| 4. MACO | 170 |
| 5. United Postal Inc. | 141 |
| 6. Nationwide Real Estate | 126 |
| 7. Barwick/Poelstra, LLC | 125 |
| 8. Keith Barket | 99 |
| 9. Republic Postal Group | 95 |
| 10. John VerMass | 87 |

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USPS/AUSPL-T1-2

Page 7, lines 11-13. Has AUSPL conducted any member or public survey, research or poll that serves as the basis for this statement in your testimony? If so, please provide all the documents used to describe the methodology and results of that undertaking. If not, please describe the basis for that statement.

Response:

Since 1956, I have been actively involved in assisting customers, elected officials and the general public on postal matters. More recently, I have advised postal lessors and served as an advocate regarding issues involving postal consolidations/closures. In my experience, nearly every person considers a post office, just that. The general public does not know the difference between a station, branch, community post office or main post office. AUSPL has not conducted any surveys or polls.

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USPS/AUSPL-T1-3

Please refer to the definitions provided in your testimony at page 8, lines 4-5. Please provide citations to any publications in which these definitions may be found.

Response:

Independent Post Office:

See Handbook 101, Post Office Discontinuance Guide, August 2004, part 232.14
“Contract stations or branches offer the same postal and nonpostal services as those of an independent Post Office, except for postage meter settings and permit mailings”. This term is commonly used to refer to a postal facility operated by a postmaster and was used to try to clarify this particular facility for readers.

Classified Station

See glossary of terms in a publication called Stations and Branches obtained from the postal historians web site titled “glossary”.

Classified Branch:

See the above response for station. It is the same for branch.

Community Post Office

See Handbook 101, Post Office Discontinuance Guide, August 2004, part 625 Name of Facility Established by Consolidation, section b.

Discontinuance:

This term was commonly used by postal personnel to identify either a closing or consolidation. This term may have been adopted so that closing or consolidation wasn't repeated numerous times in training material both oral and written, and other documents.

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USPS/AUSPL-T1-4

Please refer to page 9, lines 22-23 of your testimony. Please list and describe each of the “non-postal needs” of the community to which you refer.

Response:

In addition to mailing services, post offices serve a variety of needs for the community. Listed below (in no particular order) are some of those services, which vary from post office to post office.

- Government tax forms, social security applications, selective service applications, and passport applications.
- Fishing and hunting licenses.
- Community services, including message center, announcements posted on bulletin boards, community meeting place.
- Networking: customers enjoy the walk to the post office and talking with friends and neighbors while the mail is being sorted.
- Postmasters often assist elderly customers in preparing parcels for mailing or assist in helping them read their mail and sometimes even serve as a counselor.
- Meeting place.
- In small communities, postmasters will take action to check on customers who does not pick up their mail to make certain they are ok.
- School bus site.

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USPS/AUSPL-T1-5

Please refer to your testimony at page 9, lines 27-32 and to the testimony of Postal Service witness Kimberley Matalik at Tr. Vol2, page 525, lines 5-16.

a. Is it your belief that witness Matalik testified there that the Postal Service gives no consideration at all to customer input in the discontinuance review process? If so, please explain the basis for your belief.

Response:

When Jennifer L. Wood, Attorney for the American Postal Workers Union asked Kimberley Matalik what weight customer input had in determining whether a facility would remain open or be closed, Kimberley Matalik's response was "no weight attached to this process".

b. If your response to subpart (a) above is anything other than an unqualified negative ("no"), would you agree, based on a review of Tr. Vol. 2, page 525, lines 5-16, that Matalik testified to the effect that, as part of its qualitative judgment regarding the consolidation of a station or branch, the Postal Service assigns no specific quantitative weighing to the various factors it considers, including customer input? If not, please explain.

Response:

Yes.

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USPS/AUSPL-T1-6

Please refer to page 11, lines 5 through 12 of your testimony.

a. Please review USPS-T-2 (as amended on September 16, 2009) and confirm that the number "95" on page 11, line 5 of your testimony should be revised to read "21". If you cannot confirm, please explain.

Response:

I agree since the Postal Service has readjusted the figure from 96 to 21 for Fiscal Years 2005 thru 2008.

b. During your review of Post Office closure proposals as a postal employee, do you recall ever being aware that there were discontinuance proposals that were formulated and examined at the local or district level but:

(i) that never advanced to the region/area office for review or to headquarters for a final review and decision?

Response:

I worked on discontinuance proposals that were submitted to Postal Headquarters for a final determination by the Regional offices. However, I provided training to many district representatives with the Regional offices and offered guidance directly to district representatives by telephone whenever requested. District offices submitted discontinuance proposals to Regional offices for review before submitting the revised proposal to Postal Headquarters.

(ii) that advanced to the region/area office for consideration but did not advance to headquarters for a final agency review?

Response:

I am aware of cases that were returned to District offices by Regional offices because the documentation was incomplete or inadequate.

