

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

**Station and Branch Optimization and
Consolidation Initiative, 2009**

Docket No. N2009-1

**RESPONSE OF AMERICAN POSTAL WORKERS UNION, AFL-CIO,
WITNESS MORRISON TO UNITED STATES POSTAL SERVICE
INTERROGATORIES USPS/APWU-T2-1-25
(November 12, 2009)**

The American Postal Workers Union, AFL-CIO hereby submits the responses of witness Morrison to the following interrogatories of the United States Postal Service: USPS/APWU-T2-1-25, filed on October 29, 2009.

Each interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

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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.

Response:

PES was first contacted on October 2, 2009 and was contracted to prepare this analysis on October 6, 2009.

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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 9th, 2009. If you do not confirm, please explain the basis for any contrary understanding.

Response:

- (a) No. However, the impacts are much greater on low-income persons, particularly those who do not have access to a car to drive to the next post office.
- (b) Yes.
- (c) I reviewed the description of the process provided on the USPS website. I did not prepare a demographic analysis of the total universe of SBOC candidate stations and branches. That was beyond the scope of our contract. As I understand it, the complete list of the entire universe of potential candidate

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branches or stations was not filed in the docket for this case until after we completed our analysis.

PES benchmarked the demographics of the residents within one-half mile of the 413 stations and branches to those of the U.S. as a whole. The U.S. averages served as a proxy for the total universe of post office stations and branches.

- (d) No. When PES began our analysis, the list had already been reduced to 413 candidate stations and branches. During our study period, the list was further refined to 371 candidates. I took the opportunity then to compare the 371 candidates still on the list for consideration with the 42 stations and branches that had been eliminated from further consideration, working with my partner, Abigail Ferretti.
- (e) My understanding is that the revised list of 371 stations and branches was effective as of October 9 and available on the USPS website by October 16.

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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.”

Response:

Yes. They are the same geographies.

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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 $\frac{3}{4}$ -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 $\frac{3}{4}$ -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 $\frac{1}{2}$ -mile radius (for example, any radii referenced in subparts (b) and (c), any areas defined by ZIP Code boundaries, or any other you utilized).

Response:

- (a) I do not have that information.
- (b-c) Throughout my work with transit-oriented development and other land use planning, I have found that the large majority of Americans will not walk more than one-half mile to access transit or other services. The Washington Metropolitan Area Transit Authority conducted ridership surveys in 2005 that demonstrated the share of office commuters that traveled by automobile increased from 48 percent by auto for offices at Metro stations to 83 percent for those with offices one-half mile from the station. For resident-based commutes, the share by auto increased from 29 percent for those located at Metro stations to 54 percent for those located one-half mile from the station. Typically, one

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would expect that residents would be more willing to walk to transit for a daily commute than to stores or a post office because of the inherent savings in parking and commuting costs. When free parking is available, persons are more willing to drive. (See Washington Metropolitan Area Transit Authority, *2005 Development-Related Ridership Survey: Final Report*, p. S-3.

http://www.wmata.com/pdfs/planning/2005_Development-Related_Ridership_Survey.pdf)

The U.S. Green Building Council's LEED-Neighborhood Development certification for a neighborhood's environmental impact and energy efficiency includes criteria for proximity to transit services. A key criterion is location within one-quarter mile of a streetcar stop or one-half mile of a rapid transit stop. This measure is intended to capture the fact that many daily trips can be made on foot or by bicycle, reducing residents' dependence on travel by private automobile. (See Congress for the New Urbanism, Natural Resources Defense Council and the U.S. Green Building Council, *LEED 2009 for Neighborhood Development*, pp. 56-57. <http://www.usgbc.org/DisplayPage.aspx?CMSPageID=148>)

In addition, community land planners from the Congress for the New Urbanism designing walkable communities try to provide services within a five-minute walk of residents to encourage walking rather than driving

- (d) I did not prepare any analyses for any service area definition other than a one-half-mile radius.

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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.

Response:

I did not conduct any direct surveys or interviews with postal patrons.

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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.

Response:

- (a) Since founding PES, my clients have included:
 - District of Columbia Office of the Deputy Mayor for Planning and Economic Development
 - District of Columbia Office of Planning
 - Maryland Department of Transportation
 - Montgomery County Planning Department, Maryland-National Capital Park and Planning Commission
 - Fort Monroe Federal Area Development Authority
 - Albany Housing Authority
 - University of Arkansas Technology Development Foundation
 - Office of the Attorney General for the District of Columbia
 - Republic Properties
 - City of Mount Rainier, Maryland
 - Abdo Development, LLC
 - Clark Realty Capital, LLC
 - Maryland Transportation Authority
 - Gateway to Baltimore Homes
 - City of Raleigh, North Carolina

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(b)

Client	Issues
District of Columbia Office of the Deputy Mayor for Planning and Economic Development	Commercial development opportunities on Rhode Island Avenue, NE and at Boathouse Row along the Anacostia River; economic development strategies for Rhode Island Avenue
District of Columbia Office of Planning	Commercial development opportunities on Mount Pleasant Street, NW
Maryland Department of Transportation	Public/private partnership for State Center redevelopment
Montgomery County Planning Department, Maryland-National Capital Park and Planning Commission	Financial impacts of new mixed-use zoning on private development, and potentials for biotechnology development in the Gaithersburg West subarea
Fort Monroe Federal Area Development Authority	Fiscal impacts of redeveloping Fort Monroe and strategies for providing municipal services
Albany Housing Authority	Asset management strategies for long-term redevelopment and positioning of the AHA housing portfolio
University of Arkansas Technology Development Foundation	Economic development strategies for the City of Fayetteville, Arkansas
Office of the Attorney General for the District of Columbia	Extent of damages caused by delay in finalizing the redevelopment agreement for the Old Convention Center Site
Republic Properties	Fiscal impacts of proposed redevelopment along Maryland Avenue, SW
City of Mount Rainier, Maryland	Commercial development opportunities in the Town Center and Gateway Arts District; financial feasibility of new mixed-use development
Abdo Development, LLC	Fiscal impacts of proposed development on New York Avenue, NE in DC
Clark Realty Capital, LLC	Fiscal impacts of proposed development near Hechinger Mall in DC
Maryland Transportation Authority	Development impacts of new highway
Gateway to Baltimore Homes	Market and financial feasibility of new housing in Baltimore
City of Raleigh, NC	Housing and economic development strategies for Comprehensive Plan
Montgomery County Office of the County Executive	Fiscal impacts of County land transactions in support of Smart Growth initiatives at the Shady Grove Metro station

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- (c) I cannot provide copies of all reports and testimonies because the products are owned by my clients and by my former employer, Bay Area Economics. Following is a list of Internet links to more than 20 reports I have prepared or contributed to since 2000.

Greater Shaw/U Street Plan

<http://planning.dc.gov/planning/cwp/view,a,1285,Q,619216.asp>

Georgia Avenue/Petworth Metro Station Area and Corridor Plan

<http://planning.dc.gov/planning/cwp/view,a,1285,q,627329.asp>

Brookland/CUA Metro Station Small Area Plan

<http://planning.dc.gov/planning/cwp/view,A,1285,Q,640097.asp>

Boathouse Row Planning Study

<http://planning.dc.gov/planning/cwp/view,a,1285,q,646558.asp>

Barry Farm/Park Chester/Wade Road Redevelopment Plan

<http://planning.dc.gov/planning/cwp/view,a,1285,q,639019.asp>

Lincoln Heights and Richardson Dwellings New Communities Revitalization Plan

<http://planning.dc.gov/planning/cwp/view,a,1285,q,639012.asp>

Ward 8 Comprehensive Housing Analysis

http://www.cnhed.org/download/123321_U127242_742768/Ward%208%20Housing%20Data%20Report2.pdf

Rhode Island Avenue Economic Development Plan

<http://dcbiz.dc.gov/dmped/cwp/view,A,1365,Q,608751.asp>

Montgomery County Biotechnology Potentials

<http://www.montgomeryplanning.org/community/gaithersburg/documents/Appendix9.pdf>

Prince George's County Subregion 1 Preliminary Master Plan

http://www.pgplanning.org/Resources/Publications/Subregion_1.htm

Prince George's County Branch Avenue Corridor Master Plan

<http://www.pgplanning.org/Resources/Publications/Plan.htm>

Prince George's County Landover Gateway Sector Plan

<http://www.pgplanning.org/Resources/Publications/Plan.htm>

Fayetteville, Arkansas Economic Development Strategy

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http://www.accessfayetteville.org/government/economic_development/documents/EK_Plan_Framework-Final_1-23-09.pdf

Raleigh, North Carolina Comprehensive Plan

http://www.raleighnc.gov/publications/Planning/Comprehensive_Plan/Economic_Development-Hi_Res.pdf

Pinellas County, Florida Housing Nexus Study

<http://www.pinellascounty.org/community/nexus.pdf>

Baltimore Industrial Land Use Study

http://www.baltimoredevelopment.com/files/pdf/industrial_development/final_baltimore_industrial_report_summary.pdf

Atlanta Analysis of Development Incentives

<http://www.atlantada.com/media/AtlantaEconomicAnalysisBrochure-rev12.14.05.pdf>

Economic Impact of Johns Hopkins University

http://www.jhu.edu/news_info/reports/impact/

Atlantic City Mixed-Use Development Feasibility Analysis

http://www.njcrda.com/PDF/Block-336_12-07.pdf

Asheville Regional Housing Consortium Market and Needs Assessment

http://www.njcrda.com/PDF/Block-336_12-07.pdf

Howard County Route 40 Market Analysis

<http://www.howardcountymd.gov/DPZ/DPZDocs/MarketAnalysisFINAL020904.pdf>

Northwestern University Economic Impact

http://www.northwestern.edu/communityrelations/Economic_Impact_Report.pdf

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USPS/APWU-T2-7

Please provide all studies, and analysis thereof, undertaken in connection with APWUT-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.

Response:

(a-d) I did not analyze these questions.

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USPS/APWU-T2-8

Please provide all studies, and analysis thereof, undertaken in connection with APWUT-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.

Response:

My testimony includes the full analysis of the disproportionate representation of racial and ethnic minorities within a half-mile radius of the 413 and 371 stations and branches considered for closure.

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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.

Response:

This hypothetical premise presents a false dichotomy between the consideration of facility use data and demographic data. The point is that the process should consider **both** sets of data. Both sets of data were available to the USPS reviewers. The USPS screening process used less than perfect and complete data on facility use by relying on revenues generated without considering the mix of transactions (see APWU-T-1) and no demographic data.

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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.

Response:

My testimony includes the full analysis of the disproportionate representation of low-income households within a half-mile radius of the 413 and 371 stations and branches considered for closure.

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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.

Response:

It is my understanding that non-postal money orders are available through various drugstores, grocery stores and check cashing stores.

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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.

Response:

The following footnote provides access to the source of the estimates:

Pew Internet and American Life Project, *Home Broadband Adoption 2009*, July 2009, <http://www.pewinternet.org/~media/Files/Reports/2009/Home-Broadband-Adoption-2009.pdf>. It notes that the survey interviewed 2,253 Americans with 561 interviewed on their cell phones.

I made no independent review of the survey methodology.

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USPS/APWU-T2-13

Please explain your understanding of whether www.usps.com is accessible via broadband Internet exclusively or whether it is also meaningfully accessible via dial-up Internet service.

Response:

www.usps.com is accessible via dial-up Internet service as well as through broadband Internet service. The Pew Internet & American Life Project 2009 survey found that only seven percent of Americans access the Internet through dial-up service at home. Among non-Internet users, 48 percent are households with incomes of less than \$20,000. (See Pew Internet & American Life Project, *Home Broadband Adoption 2009*, July 2009, p. 37. <http://www.pewinternet.org/Reports/2009/10-Home-Broadband-Adoption-2009.aspx?r=1>)

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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.

Response:

Rebecca M. Blank and Michael S. Barr (editors), *Insufficient Funds: Savings, Assets, Credit and Banking Among Low-Income Households*, Russell Sage Foundation, New York, 2009, p. 3 references a 2006 publication: Brian K. Bucks, Arthur B. Kennickell and Kevin B. Moore, "Recent Changes in U.S. Family Finances: Evidence from the 2001 and 2004 Survey of Consumer Finances" *Federal Reserve Bulletin* 92(February): A13.

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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?

Response:

I was not asked to research this question. Our point was not that USPS should undertake a new investment to make all post office branches accessible on foot; rather, it was that accessible branches should not be discontinued in areas that do not have walkable access to other branches without specific consideration of the impacts of that move.

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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.

Response:

The unemployment rates are 2008 data provided by ESRI. I do not have the statistics for previous years.

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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.

Response:

- (a) Business district refers to a cluster of businesses (typically five or more) located in close proximity to each other.
- (b) I do not have economic studies to demonstrate that postal stations and branches anchor business districts. The statement is based on my 32 years working in retail feasibility analysis and neighborhood business district revitalization.
- (c) It is not my assertion that the business districts exist because of the presence of a postal station or branch. At the time that many of these older business districts were created, there were multiple anchors as well as a larger population that did not own cars. Since then, the expansion of competitive shopping centers and the proliferation of private automobiles have changed the retail landscape. In some instances, the post office branch or station may be the sole remaining anchor. In other cases, it is an important activity generator. My concern is that the USPS process did not consider the potential economic impacts of closure on the surrounding business districts.

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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?

Response:

- (a) The \$20,000 break relates to the availability of income data by income bracket. This is roughly the lower quintile of households (17.8 percent of U.S. households had incomes below \$20,000 in 2008 according to the American Community Survey conducted by the U.S. Bureau of the Census.
- (b) I did not perform any analysis based on different annual household income figures.
- (c) No, the \$20,000 benchmark seemed to be an appropriate indicator of the location of low-income households in areas surrounding postal stations or branches.
- (d) I did not perform any analysis based on different radii.
- (e) In my experience, low-income households are most typically clustered in inner-city neighborhoods, rural areas and the exurban fringe of metropolitan areas.

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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.

Response:

- (a) I did not use an explicit definition of undue burden. The US Department of Housing and Urban Development defines a “disproportionate” burden on minority and other special populations to be 110 percent of the rate of the general population (typically referring to rent burdens, overcrowding and substandard housing conditions). The term “reasonable” is a value judgment that I did not make.
- (b-e) The term “reasonable” is a value judgment that I did not make.
- (f-g) See Response to subpart (a) above.

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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?

Response:

My analysis suggests that low-income and minority households would be disadvantaged by a system that relied on web-based communication.

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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.

Response:

This was information provided by my client based on the response of USPS Witness Matalik to APWU Interrogatory USPS/APWU-T2-2(d-e), [Tr. Vol. 2, page 401, September 30, 2009]. Attached to this response was "Station and Branch Optimization and Consolidation Initiative Community Input Field Guidelines-as of July 15, 2009." On the first page of the Guidelines it states "questionnaires will be made available to walk-in retail customers upon request." This is also stated in USPS Library Reference N2009-1/5, Discontinuance of Classified Stations and Branches Training Slides, page 18.

RESPONSES OF AMERICAN POSTAL WORKERS UNION, AFL-CIO
WITNESS ANITA MORRISON TO INTERROGATORIES
OF UNITED STATES POSTAL SERVICE

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.

Response:

Confirmed.

RESPONSES OF AMERICAN POSTAL WORKERS UNION, AFL-CIO
WITNESS ANITA MORRISON TO INTERROGATORIES
OF UNITED STATES POSTAL SERVICE

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.

Response:

I have not undertaken analysis of that relationship.

RESPONSES OF AMERICAN POSTAL WORKERS UNION, AFL-CIO
WITNESS ANITA MORRISON TO INTERROGATORIES
OF UNITED STATES POSTAL SERVICE

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, 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.

Response:

Yes, but the efficacy of those alternative channels depends upon the nature of the community and should be considered in the closure decision process. Inner-city neighborhoods often do not have grocery stores or drugstores, so those alternative channels may not be readily available to those residents.

RESPONSES OF AMERICAN POSTAL WORKERS UNION, AFL-CIO
WITNESS ANITA MORRISON TO INTERROGATORIES
OF UNITED STATES POSTAL SERVICE

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.

Response:

I do not have statistics on the percentage of residential postal customers who make daily visits to postal retail facilities.