

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, DC 20268-0001

STATION AND BRANCH OPTIMIZATION AND  
CONSOLIDATION INITIATIVE, 2009

DOCKET NO. N2009-1

INITIAL REPLY BRIEF OF DAVID B. POPKIN

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Respectfully submitted,

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On pages 7 and 8 of the United States Postal Service's Initial Brief, the Postal Service makes a comparison between the 241 candidate stations and branches and the approximately 27,200 Post Offices and 4,800 subordinate stations and branches countrywide and indicates on lines 3 and 4 of page 8 that this would be less than 0.075 percent. The actual percent of 241 compared to 32,000 total facilities is 0.753 percent. The Postal Service is understating the percentage by a factor of approximately 10.

On pages 10 and 11 of the United States Postal Service's Initial Brief, the Postal Service makes another comparison between the potential loss of 214 ZIP Code service areas and the approximately 42,500 5-digit ZIP Code service areas countrywide and states that it could - at most - affect customers in just over 1 out of every 2000 5-digit ZIP Code areas. If one divides 42,500 by 241, one would arrive at 1 out of every 176.35 areas. Once again, the Postal Service is understating the claim by a factor of approximately 11.

In both of these cases as well as the other examples in the Initial Brief, the Postal Service is comparing apples and oranges. The 241 remaining facilities are from the largest postal facilities in the country while the countrywide number covers facilities from the largest down to the smallest.