

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, DC 20268-0001

Retail Access Optimization Initiative

Docket No. N2011-1

PUBLIC REPRESENTATIVE  
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF  
DOCUMENTS TO UNITED STATES POSTAL SERVICE  
(PR/USPS-13-16)

(August 26, 2011)

Pursuant to Rules 25 through 28 of the Postal Regulatory Commission Rules of Practice, the Public Representative hereby submits the following interrogatories and requests for production of documents. Definitions and instructions included with the Public Representative's interrogatories PR/USPS- T1- 1-5, dated August 1, 2011, are hereby incorporated by reference.

Respectfully Submitted,

/s/ Tracy N. Ferguson  
Tracy N. Ferguson  
Public Representative for  
Docket No. N2011-1

901 New York Avenue, N.W.  
Washington, DC 20268-0001  
(202) 789-6844; Fax (202) 789-6891  
e-mail: [Tracy.Ferguson@prc.gov](mailto:Tracy.Ferguson@prc.gov)

**PR/USPS-13**

USPS-LR-NP3 contains operating cost and revenue information for 30645 postal retail locations. USPS-LR-NP1 file "FY2010 Offices under \$100,000 by technology.xls" contains information on postal retail locations with less than \$100,000 of walk in revenue in FY 2010. USPS-LR-NP3 utilizes a 5 or 6 digit finance number to identify postal retail locations. USPS-LR-NP1 utilizes a 9 or 10 digit finance number to identify postal retail locations. Please provide a crosswalk between the postal retail locations in USPS-LR-NP1 file "FY2010 Offices under \$100,000 by technology.xls" and USPS-LR-NP3.

**PR/USPS-14**

In response to PR-USPS-T1-13, the Postal Service stated that no facilities under consideration for discontinuance pursuant to the RAO Initiative were co-located with a BMEU. However, the FY2010 operating revenue for many postal retail locations as provided in USPS-LR-NP3 is greater than the FY2010 walk in revenue as provided in USPS-LR-NP1. See "FY2010 Offices under \$100,000 by technology.xls" tab "Emoves (Manual)" cell I2, "Lib Ref for PR1e—NP!" tab "data" cell I18366.

- a. Please confirm that postal retail location in cell I2 of "FY2010 Offices under \$100,000 by technology.xls" tab "Emoves (Manual)" is the same location as "Lib Ref for PR1e—NP!" tab "data" cell I18366. If not, please point to the correct cell reference in "Lib Ref for PR1e—NP!" tab "data" for the postal retail location on line 2 of "FY2010 Offices under \$100,000 by technology.xls" tab "Emoves (Manual)".
- b. Please confirm the FY2010 operating revenue for this location is greater than the FY 2010 walk in revenue. If not, please point to the corrected information.
- c. Please provide a list of products included in walk in revenue
- d. Please provide a list of products included in operating revenue.
- e. For FY2010, please provide detailed revenue by product for the postal retail location in cell I2 of "FY2010 Offices under \$100,000 by technology.xls" tab "Emoves (Manual)" that explains what product lines constitute walk in revenue and what product lines do not constitute walk in revenue.

**PR/USPS-15**

USPS-LR-NP3 contains operating cost information for postal retail locations.

- a. Please describe the sources of operating cost by cost segment (i.e. cost segment 3.2 window services, 6.1 in office direct labor, 7.2 delivery activities, 15.1 rents)

- b. Please provide operating cost information for FYs2008, 2009, and 2010 that does not include costs associated with delivery activities.
- c. Please provide operating cost information for FYs2008, 2009, and 2010 that isolates operating cost by cost segment.

**PR/USPS-16**

Please provide the following information from the FDB in a CSV for each postal retail location.

- a. facility\_id
- b. facility\_
- c. facility\_type
- d. facility\_addr1
- e. facility\_zip4
- f. alms\_finance\_nbr
- g. bmeu\_ind
- h. cag\_code
- i. city\_delivery\_ind
- j. congress\_district\_id
- k. contract\_branch\_ind
- l. contract\_facty\_ind
- m. contract\_station\_ind
- n. gov\_bldg\_resident\_ind
- o. global\_express\_site\_ind:
- p. own\_lease\_code
- q. scf\_code
- r. scf\_ind
- s. top\_eas\_pces\_f\_level
- t. general\_delivery\_ind
- u. bulk\_mail\_new\_permit\_ind
- v. passport\_appt\_required\_ind
- w. atm\_ind
- x. bus\_hrs\_open\_mon
- y. bus\_hrs\_closed\_mon
- z. bus\_hrs\_open\_tue
- aa. bus\_hrs\_closed\_tue
- bb. bus\_hrs\_open\_wed
- cc. bus\_hrs\_closed\_wed
- dd. bus\_hrs\_open\_thu
- ee. bus\_hrs\_closed\_thu
- ff. bus\_hrs\_open\_fri

gg. bus\_hrs\_closed\_fri  
hh. bus\_hrs\_open\_sat  
ii. bus\_hrs\_closed\_sat  
jj. b\_mail\_acceptance\_station\_num  
kk. bldg\_historic\_code  
ll. bldg\_area\_int\_tot\_sqft  
mm. coll\_average\_bulk\_mail  
nn. dm\_u\_stffng\_bmeu\_fac\_id  
oo. nass\_resp\_scf\_code  
pp. rtl\_retail\_window\_cnt  
qq. rtl\_window\_clerk\_cnt  
rr. rtl\_irt\_cnt:  
ss. rtl\_working\_retail\_window\_cnt  
tt. ANNUAL\_RENT\_AMT  
uu. BUILDING\_LEASE\_FMV\_AMT  
vv. LEASE\_EXPIRATION\_DATE  
ww. TERM\_YRS\_CNT  
xx. FAC\_ZIP\_CARRIERS\_T\_CARRIER\_ROUTE  
yy. FDB\_EACSS\_V\_No of Employees  
zz. NASS\_CODE  
aaa. NASS\_TYPE