

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

RETAIL ACCESS OPTIMIZATION INITIATIVE, 2011

Docket No. N2011-1

**RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
PRESIDING OFFICER'S RULING NO. N2011-1/5
(September 6, 2011)**

On September 1, 2011, the Presiding Officer issued Presiding Officer's Ruling No. N2011-1/5, directing the Postal Service to "provide specific estimates of dates when responses, including all applicable data or library references, will be available for [certain identified] discovery responses." This pleading serves as the Postal Service's response to this ruling. The issues identified by Presiding Officer's Ruling No. N2011-1/5 are listed below, followed by the Postal Service's responses.

- 1. The source for the statement that "approximately 85 percent of postal retail revenue is generated from the sale of postage." See Response of the United States Postal Service to Public Representative Interrogatories PR/USPS-T1-4 and 5 Redirected from Witness Boldt, August 8, 2011, at T1-5.**

The Postal Service provided data responsive to this request in USPS-LR-N2011-1/NP2, filed on July 27, 2011.

2. **The driving distances to the nearest alternate retail locations for each facility under consideration in the RAOI. See Responses of United States Postal Service Witness Boldt to Presiding Officer's Information Request No. 1, August 9, 2011, question 14.**

The Postal Service is in the process of collecting information responsive to this request, and expects to provide a response by noon on Wednesday, September 7, 2011.

3. **Walk-in revenue figures for each facility, and data reflecting the combined earned workload for mail distribution, Post Office Box delivery, and retail window service activity used to determine whether the facilities exceeded the "low earned workload" threshold. See Responses of the United States Postal Service to NAPUS Interrogatories NAPUS/USPS-T1-1 through T1-22, August 15, 2011, at T1-8 (Response to NAPUS).**

The Postal Service provided the walk-in revenue for each facility in Library Reference USPS-LR-N2011-1/NP5. The Postal Service is in the process of collecting information responsive to the remaining aspects of this request, and expects to provide a response by noon on Wednesday, September 7, 2011.

4. **POS terminal distribution by CAG level. See Response to NAPUS at T1-16.**

The Postal Service is in the process of collecting information responsive to this request, and expects to provide a response by noon on Wednesday, September 7, 2011.

5. **Hours of operation, facility finance numbers, and street addresses for facilities in the RAOI. See Response of the United States Postal Service to APWU Interrogatories APWU/USPS-T1-1 and T1-3 through 5, August 23, 2011, at T1-1.**

The Postal Service provided this information in USPS-LR-N2011-1/NP6.

6. Response to Presiding Officer's Information Request No. 2, question 12, concerning the Yezer research. See United States Postal Service Responses to Presiding Officer's Information Request No. 2, August 30, 2011.

The Postal Service is in the process of collecting information responsive to this request, and expects to provide a response by noon on Wednesday, September 7, 2011.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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