

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, DC 20268-0001

RETAIL ACCESS OPTIMIZATION  
INITIATIVE, 2011

DOCKET NO. N2011-1

DAVID B. POPKIN MOTION

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Respectfully submitted,

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On September 7, 2011, the Postal Service filed a Notice to accompany two Library References, USPS-LR-N2011-1/13 and the corresponding USPS-LR-N2011-1/NP8. This notice proposes to redact the Revenue Data and the Retail Facility Finance Number and provides their claimed justification for that action.

Both of these items have been released in the past by the Postal Service and the Finance Number continues to be released.

Some time ago, the Postal Service released a book containing the revenue of every post office in the country.<sup>1</sup>

Furthermore, if the revenue at the facilities involved in the Docket was such that it would entice a competitor to try and take over the customers, the Postal Service would not be proposing to discontinue that facility. It is also noted that the Postal Service provided Revenue Data in the response to Interrogatory NLP/USPS-1 subpart [e] in the current Docket.

The Postal Service continues to make Finance Numbers public in the Address Management Post Office Changes section of the bi-weekly Postal Bulletin.<sup>2</sup> Finance

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<sup>1</sup> If I recall it was a small paperback book with a blue cover.

Numbers also appear on the Postal Service's website in the listings of rented and non-rented facilities. Finance Numbers were shown in the Directory of Post Offices. Since the USPS right hand continues to make Finance Numbers public, it is hard to place much stock in the left hand's pleadings that they must be protected.

It is also noted in Question 1 of POIR No. 4 that the data is requested by finance number. There must be a reason to make that the most useful presentation of the requested data and therefore all participants should have the same data.

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<sup>2</sup> The last issue with the data was on September 8, 2011.