

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

RETAIL ACCESS OPTIMIZATION INITIATIVE, 2011

Docket No. N2011-1

**RESPONSES OF THE UNITED STATES POSTAL SERVICE  
TO DAVID POPKIN INTERROGATORIES DBP/USPS-74 AND 75**

The United States Postal Service hereby provides institutional responses to the above-listed interrogatories of David Popkin dated September 9, 2011. Each interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Anthony F. Alverno, Jr.  
Chief Counsel, Global Business

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2998; Fax -5402  
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**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO POPKIN INTERROGATORY**

**DBP/USPS-74**

Please refer to your Library Reference USPS-LR-N2011-1/13 and the corresponding non-public version NP8.

- [a] Please advise the method by which the entries have been sorted.
- [b] The entries do not appear to be consistently correct. For example, on page 52 it shows entries for PM Central Islip / Fort George / PVD-Cranston Finance Unit as being in the Northern NJ PFC when they are located in NY, NY, and RI. That worksheet is PART of the data used to answer the request to provide a count of offices by CAG (Cost Ascertainment Group). Please explain what appears to be an obvious error in these three entries and also please discuss the validity of the remaining entries.
- [c] Please explain the criteria for an office being categorized in each of the CAG levels.

**RESPONSE**

- (a) The entries were sorted on the basis of the Facility ID number from the Facilities Data Base, which was redacted.
- (b) The sort by CAG is correct. The columns for Area and District were not used in the sort because they were extraneous to the data sort needed to answer the question and should not have accompanied the summary worksheet that reflects the number of offices by CAG and the aggregate CAG percentage total. Please continue to rely on other Library References for Area and District affiliations.
- (c) Cost Ascertainment Group levels are based upon revenue unit *classification*. As of October 1 of each year, Post Offices are categorized through a cost ascertainment grouping (CAG) process based on allowable postal revenue units for the second preceding fiscal year as follows:  
  
One revenue Unit is \$387.55

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
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**RESPONSE to DBP/USPS-74 (continued)**

- (1) *CAG A–G.* Post offices having 950 or more revenue units.
- (2) *CAG H–J.* Post offices at least 190 but fewer than 950 revenue units.
- (3) *CAG K.* Post offices having at least 36 but fewer than 190 revenue units.
- (4) *CAG L.* Post offices having fewer than 36 revenue units.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
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**DBP/USPS-75**

Please refer to your Library Reference USPS-LR-N2011-1/14 and the corresponding non-public version NP9. This Library Reference appears to be in four sections.

- SECTION ONE Post Office Box Usage
  - SECTION TWO Waiting List Count
  - SECTION THREE Retail Window Count
  - SECTION FOUR Manpower Usage
- [a] SECTION ONE Please provide a listing of the column heading in 12 point type.
  - [b] SECTION ONE Please explain what each of the column headings represent.
  - [c] SECTION ONE Please advise the method by which the entries have been sorted.
  - [d] SECTION TWO Please advise the method by which the entries have been sorted.
  - [e] SECTION THREE Please advise the method by which the entries have been sorted.
  - [f] SECTION FOUR Please advise the method by which the entries have been sorted.
  - [g] SECTION FOUR Please explain what each of the column headings represent.
  - [h] SECTION FOUR Please provide a listing of what each of the entries in all of the columns except the first two stands for.

**RESPONSE**

(a-h) See the Excel workbook attached to this response.