

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 INTERROGATORY DBP/USPS-71**

The United States Postal Service provides an institutional response to the above-listed interrogatory of David Popkin dated September 7, 2011. Each interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Anthony F. Alverno  
Chief Counsel, Global Business

James M. Mecone  
Michael T. Tidwell

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 INTERROGATORY OF DAVID POPKIN**

**DBP/USPS-71.** Please refer to the updated Library Reference USPS-LR-N2011-1/4. The original document had a total of approximately 3459 pages and the updated document has a total of approximately 2240 pages. The only explanation provided by the Postal Service was that it was placed in a form more consistent with the filing of other library references in this docket.

[a] Please describe in detail the changes that were made in the filing of the revised version.

[b] On what basis are the individual offices sorted in the listing of facilities?

[c] To the extent that questions contained in Interrogatory DBP/USPS-62 still apply to the revised Library Reference, a response is still desired.

**RESPONSE**

[a] In Updated Library Reference USPS-LR-N2011-1/4, the page layout was modified to include more columns per page for each spreadsheet, and it includes all of the documents from the original filing in a single file.

[b] Updated Library Reference USPS-LR-N2011-1/4 contains multiple spreadsheets, and each spreadsheet is sorted on a different basis. The spreadsheets contained in Updated Library Reference USPS-LR-N2011-1/4 reflect individual office sortation based on proximity to other retail facilities or confidential information contained in USPS-LR-N2011-1/NP1 (the non-public version of USPS-LR-N2011-1/4).

[c] See the response to DBP/USPS-62.