

Before The
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

In the Matter of: :
Pimmit Branch :
Falls Church, Virginia 22043 : Docket No. A2011-90
(Elaine J. Mittleman, Petitioner):
:

**MOTION OF PETITIONER TO
REQUEST THE UNITED STATES POSTAL SERVICE TO
SUPPLEMENT THE RECORD CONCERNING THE
PIMMIT BRANCH STUDY
FALLS CHURCH, VIRGINIA 22043
(November 7, 2011)**

Petitioner Elaine Mittleman hereby respectfully submits this motion to request that the United States Postal Service (öPostal Serviceö) supplement record concerning the Pimmit Branch study. In a letter dated October 5, 2011, from George S. Chichester, Manager Post Office Operations, there was a reference to a Pimmit Branch study. *See* attached USPS correspondence. Petitioner submits that more information about this study and the decision to undertake the study is needed.

ARGUMENT

The United States Postal Service (öPostal Serviceö) filed its Initial Brief in Docket No. N2011-1, concerning the Retail Access Optimization

Initiative 2011, on November 4, 2011. In its Brief at page 6, the Postal Service described the categories that have been identified for discontinuance review. Category 3 is for retail annexes that had FY 2010 revenue of less than \$1 million and are located within a half-mile of at least five postal retail and/or alternate access sites.

The Pimmit Branch likely would be considered under Category 3, based on its revenue. The Final Determination (attached hereto) for the Pimmit Branch states at page 1 that office receipts for FY 2009 were \$687,149. No information is given for FY 2010 revenue.

However, the Pimmit Branch does not have at least five postal retail and/or alternate access sites located within a half-mile. The Final Determination states at page 5 that there are three Stamps on Consignment locations within 1.2 miles of Pimmit. Two of the sites listed are Chevy Chase, which is apparently a reference to Chevy Chase Bank. However, Chevy Chase Bank no longer exists. It is not clear whether these sites listed actually do have Stamps on Consignment.

In light of the lack of at least five postal retail and/or alternate access sites located within a half-mile of the Pimmit Branch, it does not appear that the Pimmit Branch would be considered for discontinuance review under the RAO Initiative.

It is necessary to understand the basis on which the Pimmit Branch was selected for study. It apparently was not based on the initiatives. Thus, in order to evaluate the Final Determination, petitioner requests that the Postal Service explain the basis on which the Pimmit Branch was selected for study and discontinuance. The Postal Service should also correct the references in the Final Determination to locations at Chevy Chase, as that information appears to be incorrect.

Petitioner requests that this information be provided and the record in this appeal be supplemented. Petitioner submits that this information is needed to prepare the brief in support of the petition. Petitioner also requests an extension of time to file the brief, which was due on November 1, 2011, until she has had time to review the additional information about the Pimmit Branch study and the basis for the decision to conduct the study.

CONCLUSION

For the foregoing reasons, the Postal Service should provide information and supplement the record in this appeal about the Pimmit Branch study and the basis for the decision to conduct the study. Petitioner requests an extension of time to file the initial brief until after the record has been supplemented.

Respectfully submitted,

/s/ Elaine Mittleman

Elaine Mittleman

2040 Arch Drive

Falls Church, VA 22043

(703) 734-0482

Petitioner