

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

POST OFFICE STRUCTURE PLAN

Docket No. N2012-2

**RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS DAY
TO PUBLIC REPRESENTATIVE INTERROGATORIES
(PR/USPS-1—6, 8—9)**

The United States Postal Service today files the responses of witness Jeffrey Day to the above-identified interrogatories of the Public Representative, dated June 8, 2012.

The interrogatories are stated verbatim and followed by the response.

Respectfully submitted,

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**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS DAY
TO PUBLIC REPRESENTATIVE INTERROGATORY**

PR/USPS-T1-1.

The following refers to the POStPlan offices that are scheduled to have reduced Post Office window hours. Your testimony indicates that the realignment of window service hours will take into consideration the community meeting feedback to determine the time of day retail window hours will be available. USPS-T-1 at 19.

- a. For those POStPlan offices that currently do not offer Saturday hours, does the Postal Service plan to offer Saturday hours at each office? At any offices? Please explain why or why not.
- b. Will window service hours be the same for each day of the week that a given POStPlan office is open? If not, why?
- c. Will late afternoon retail window hours be available at each office at least once a week? If not, please explain how the Postal Service plans to provide retail window service for customers who are unable to get to the Post Office during normal weekday business hours. For example: 8:00 a.m. to 5 p.m. Monday through Friday.

RESPONSE

- a. Saturday retail window service hours will not be changed pursuant to POStPlan.
- b-c. As described on page 16 of the Direct Testimony of Jeffrey C. Day on behalf of the United States Postal Service (USPS-T-1), the Postal Service expects that selection of the time of day for retail window service hours will reflect consideration of input provided in response to customer surveys. The Postal Service expects that this decision will be made at the local level. Where currently Post Offices offer retail window service hours on Saturday, those hours will not be changed pursuant to POStPlan.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS DAY
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PR/USPS-T1-2.

The following refers to your testimony (USPS-T-I) at 16. You indicate that the Postal Service will annually review the Adjusted Earned Workload (AEWL) for all Level 2, 4, and 6 Remote Post Offices (RMPOs) and Part-time Post Offices (PTPOs). The review may alter the number of hours each is open.

- a. Upon completion of the annual review, will RMPOs and/or PTPOs be subject to a discontinuance study?
- b. If your response to part “a” is affirmative, please explain the criteria the Postal Service will use to determine whether a discontinuance study of a RMPO and/or PTPO is warranted.
- c. Please provide examples of “other changes that could result in the reclassification of certain Post Offices.”

RESPONSE

a-b. The annual evaluation has the purpose of confirming that over time retail window service hours continue to reflect actual customer use of the services provided by a particular Post Office. Where a change in customer use of services requires an adjustment to retail window service hours, the annual evaluation will allow the Postal Service to make the adjustment quickly. Nevertheless, POSTPlan will not impact the Postal Service’s ability to initiate future discontinuance studies for RMPOs and PTPOs, like other Post Offices, pursuant to the criteria and policies established in USPS Handbook PO-101 (USPS-LR-N2012-2/5).

c. The reference to “other changes that could result in the reclassification of certain Post Offices” includes long-term changes to transportation access points, such as the construction of bridges that would reduce the driving distance between Post Offices to less than 25 miles, and the impact on proximity due to physical changes to retail facilities, such as suspension of a Post Office due to a natural disaster.

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PR/USPS-T1-3.

Please provide examples of “the operational needs of the Postal Service” as that phrase is used at pages 17-18 of your testimony. Please explain when “the operational needs of the Postal Service” would lead to discontinuance even if a “communit[y] [wishes] to maintain [its] existing Post Office.” USPS-T-1 at 24.

RESPONSE

As used in witness Day’s testimony, “operational needs of the Postal Service” include the availability of the facility, utilities, and staffing. For example, a discontinuance study of a Post Office might be initiated due to operational needs when the Postal Service is unable to acquire necessary staffing or utilities to operate the office safely.

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PR/USPS-T1-4.

With regard to Post Offices that closed during FY2011 or during quarters 1 and 2 of FY2012, will the Postal Service resurvey communities to see if they would elect to have an RMPO or a PTPO in their community? If your response is other than affirmative, please explain.

RESPONSE

No.

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PR/USPS-T1-5.

The following question refers to your testimony at 21. Please provide a copy of the POSTPlan community survey that the Postal Service will begin distributing in September 2012.

RESPONSE

The Postal Service is in the process of developing a community survey and will provide a copy of a final form when it is completed.

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PR/USPS-T1-6.

Please refer to your testimony at 17. You state that “after candidate Post Offices are identified, Postal Service personnel will survey customers to solicit their preference for realigned window service hours or discontinuance study”

- a. Please provide a copy of the survey to be used to solicit POStPlan office customer preferences.
- b. If a formal survey is unavailable, please specifically explain how Postal Service personnel will gather customers’ preferences.
- c. How will the Postal Service contact local residents of the proposed POStPlan office to obtain their preferences?

RESPONSE

- a. Please see the response to PR/USPS-T1-5.
- b. The Postal Service intends to make a survey available to customers of POStPlan candidate Post Offices. It is expected that the survey will request that customers express their preference for one of four service options – Remotely Managed Post Office (RMPO) or Part-Time Post Office (PTPO) classification, discontinuance study and potential carrier service, discontinuance study and potential local business Village Post Office, or discontinuance study and potential service through a nearby Post Office. To account for the possible selection of the RMPO or PTPO classification option, it is expected that the survey will request that customers describe their preferred time period during the day for weekday retail window service hours.
- c. The Postal Service intends to mail surveys and related information to customers, and make the surveys and information available to customers at the retail counter of candidate Post Offices.

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PR/USPS-T1-8.

Please refer to Figure 5 that provides window service hours and average daily earned work load by Post Office classification after POSTPlan. USPS-T-1 at 10.

- a. Please discuss the basis for the new Post Office classification after POSTPlan.
- b. Did you attempt to estimate revenues and costs for each Post Office after realignment of window service hours with customer use to understand the potential impact of POSTPlan on Post Office efficiency?
- c. Based on Figure 5, there is a significant divergence between daily window service hours and average daily earned workload for level 4 and level 6 & PTPO Post Offices. Did you consider including additional Post Office classifications (such as, *Office level 3* with daily window service of 3 hours, and *Office level 5* with daily window service of 5 hours) to more closely match window service hours with customer use?

RESPONSE

- a. The basis for the new Post Office classification after POSTPlan is Adjusted Earned Workload.
- b. No.
- c. No.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS DAY
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PR/USPS-T1-9.

You state that Post Offices with more than 5.74 hours of Adjusted Earned Workload (AEWL) will be upgraded to EAS Level 18 or above, and those Post Offices with AEWL 5.74 or fewer hours will either be realigned with customer use or may be studied for discontinuance. USPS-T-1 at 10. Please explain how the 5.74-hour cut-off is determined and the justification for it.

RESPONSE

The 5.74 cut-off determination is a numerical analysis of the AEWL. If a Post Office's AEWL is greater than the numerical threshold, 5.74 hours, it will be upgraded to EAS Level 18 or above. The justification of using greater than 5.74 hours of AEWL as the threshold was based on management's determination of operational needs and consultations with Postmaster associations.