

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

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Post Office Structure Plan

Docket No. N2012-2

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**INTERROGATORIES OF ELAINE MITTLEMAN  
TO UNITED STATES POSTAL SERVICE**

**Set 2**  
(EM/USPS-28-39)  
June 25, 2012

Pursuant to 39 C.F.R. §§ 3001.25 through 3001.28, Elaine Mittleman hereby submits the following interrogatories. This is the second set submitted by Elaine Mittleman.

Respectfully submitted,

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ELAINE MITTLEMAN INTERROGATORIES TO USPS-Set 2

EM/USPS-28. The Direct Testimony of Jeffrey C. Day (USPS-T-1) states at page 6 that “(t)he Postal Service retail network currently offers window service hours that, on average, far exceed actual customer use of postal services.” As shown in Figure 2 on the same page, the Average Earned Workload exceeds the Average Retail Hours for both Levels 15 and 16. Why are these Levels included in the plan to reduce hours, if the Average Earned Workload exceeds the Average Retail Hours?

EM/USPS-29. What savings are attributed for each Level 15 and 16, including labor savings, in the plan to reduce retail hours?

EM/USPS-30. What savings would be generated from this plan if Level 15 and 16 post offices were not included in the plan?

EM/USPS-31. Will Level 18 post offices be reviewed for a reduction in retail hours?

EM/USPS-32. How many post offices are anticipated to be upgraded to Level 18?

## ELAINE MITTLEMAN INTERROGATORIES TO USPS-Set 2

EM/USPS-33. The Direct Testimony of Jeffrey C. Day (USPS-T-1) states at page 17 that “the requirements for discontinuance ... are not applicable to the Postal Service’s procedure for determining realignment of retail window hours.” If the Postal Service is asserting that it does not have to comply with the statutes and regulations concerning discontinuance, what procedures will the Postal Service be required to follow in this plan?

EM/USPS-34. What procedures will be used by the Postal Service to ensure that postal customers get a fair hearing on and consideration of their concerns about the plans to realign retail window hours?

EM/USPS-35. The Direct Testimony of Jeffrey C. Day (USPS-T-1) states at page 20 that “during the week of February 20, 2012, Opinion Research Corporation, Inc. (ORC), on behalf of the Postal Service, conducted quantitative research to assess consumer preference for alternatives available for Post Offices.” Did ORC consider or review the questionnaire responses and information from community meetings held by the Postal Service during 2011-2012 while assessing consumer preferences?

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EM/USPS-36. What use is the Postal Service making of the questionnaire responses and information from community meetings held during 2011-2012?

EM/USPS-37. Are the questionnaire responses and information from community meetings held during 2011-2012 still considered valid information?

EM/USPS-38. Why did the Postal Service authorize research by ORC concerning consumer preference while the Postal Service had determined to close many post offices? Did the Postal Service evaluate whether the results of the ORC research were consistent with the position of the Postal Service about closing post offices?

EM/USPS-39. Why did the Postal Service fail to advise the PRC and those appealing to the PRC about closings of the existence of the ORC research? Why did the Postal Service fail to advise the PRC and those appealing to the PRC of the consideration and possibility of an alternative plan to reduce retail hours, rather than to close post offices?