

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

POST OFFICE STRUCTURE PLAN

Docket No. N2012-2

**UNITED STATES POSTAL SERVICE RESPONSES TO ELAINE MITTLEMAN
INTERROGATORIES (EM/USPS-28—39)**
(July 2, 2012)

The United States Postal Service today files its institutional responses to the above-identified interrogatories of Elaine Mittleman, dated June 25, 2012. Each interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE
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**UNITED STATES POSTAL SERVICE
RESPONSE TO ELAINE MITTLEMAN INTERROGATORY**

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?

RESPONSE

The numbers in Figure 2 on page 6 of the Direct Testimony of Jeffrey C. Day (USPS-T-1) represent averages across the indicated EAS Levels. As explained by witness Day on page 12, Post Offices having more than 5.74 hours of AEWL will be categorized as EAS Level 18 or above. As further illustrated in Figure 7 on page 15 of witness Day’s testimony, 1,799 current EAS Level 15 Post Offices and 1,908 current EAS Level 16 Post Offices are expected to be upgraded to EAS Level 18 Post Offices. However, the remaining current EAS Level 15 and 16 Post Offices have an AEWL of 5.74 or less, indicating that they will be classified as RMPOs or PTPOs under POSStPlan.

**UNITED STATES POSTAL SERVICE
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EM/USPS-29.

What savings are attributed for each Level 15 and 16, including labor savings, in the plan to reduce retail hours?

RESPONSE

Please see the response to POIR No. 1, Question 10 and library reference USPS-LR-N2012-2/6.

**UNITED STATES POSTAL SERVICE
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EM/USPS-30.

What savings would be generated from this plan if Level 15 and 16 post offices were not included in the plan?

RESPONSE

Please see the response to POIR No. 1, Question 10 and library reference USPS-LR-N2012-2/6.

**UNITED STATES POSTAL SERVICE
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EM/USPS-31.

Will Level 18 post offices be reviewed for a reduction in retail hours?

RESPONSE

Please see the response to DBP/USPS-6(a).

**UNITED STATES POSTAL SERVICE
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EM/USPS-32.

How many post offices are anticipated to be upgraded to Level 18?

RESPONSE

Please see the Direct Testimony of Jeffrey C. Day (USPS-T-1) at page 15, Figure 7.

**UNITED STATES POSTAL SERVICE
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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?

RESPONSE

The procedures set forth in 39 U.S.C. § 404(d) and Handbook PO-101 apply to Post Office discontinuance studies, and the Postal Service intends to follow them when it selects a Post Office for discontinuance study. To the extent POSTPlan involves preservation of an existing facility and reduction in window services hours, implementation will be guided by the criteria established in this docket, and in the instructional memorandum referenced in the response to Presiding Officer’s Information Request No. 2, Question 14. To the extent the review of a Post Office performed under POSTPlan results in a discontinuance study, then the procedures of Handbook PO-101 will be followed.

**UNITED STATES POSTAL SERVICE
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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?

RESPONSE

See pages 17-19 of the Direct Testimony of Jeffrey C. Day on Behalf of the United States Postal Service.

**UNITED STATES POSTAL SERVICE
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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?

RESPONSE

No. Please see Library Reference USPS-LR-N2012-2/4. The Questionnaire and Results represent the scope of the survey.

**UNITED STATES POSTAL SERVICE
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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?

RESPONSE

To the extent this interrogatory is referring to completed questionnaires, as described in and required by Handbook PO-101 (USPS-LR-N2012-2/5), the Postal Service is using those results for their intended use as described in and required by Handbook PO-101 (USPS-LR-N2012-2/5).

**UNITED STATES POSTAL SERVICE
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EM/USPS-37.

Are the questionnaire responses and information from community meetings held during 2011-2012 still considered valid information?

RESPONSE

To the extent this interrogatory is referring to completed questionnaires, as described in and required by Handbook PO-101 (USPS-LR-N2012-2/5), the Postal Service considers those survey results to be valid for their intended use as described in and required by Handbook PO-101 (USPS-LR-N2012-2/5).

**UNITED STATES POSTAL SERVICE
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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?

RESPONSE

Please see the Direct Testimony of Jeffrey C. Day (USPS-T-1) at page 10 (“The POStPlan reflects a determination by senior management to explore options other than discontinuance of underutilized Post Offices. . . .”). Please also see witness Day’s testimony at page 19 (explaining that the Postal Service’s expectation “that most communities will prefer that Post Offices remain open with realigned hours” is based on both “prior experience and market research”).

**UNITED STATES POSTAL SERVICE
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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?

RESPONSE

The Postal Service is aware of no disclosure obligation related to the research referenced in this interrogatory. The Postal Service included the research in this docket to support the changes proposed in this docket.