

Ms. Ruth Y. Goldway, Chairperson  
Postal Regulatory Commission  
901 New York Avenue, NW Suite 200  
Washington, DC 20268-001

Dear Ms. Goldway:

Please accept these comments into the public record for Docket N2009-1

The USPS proposes to close 3 branch stations in my city, Albany NY. All 3 stations are located in densely populated urban areas and serve large numbers of low-income, racially diverse, disabled and elderly customers. All 3 branches are located in vibrant, mixed use neighborhoods, and many customers walk to the branches. The closure of these stations will have severe negative impacts on all 3 communities and the City as a whole.

(And no one really knows why these branches... the Albany Postal District covers hundreds if not thousands of miles... and my fair City was singled out for this distinction.. no postal employee has come forward or explained.. why Albany and why 3 in one blow.)

It seems, although the USPS has not been very forthcoming, the alternatives proposed after the closure of these branches will limit the accessibility of postal services for current users, requiring use of private auto or public transportation (at an additional cost) in most instances. Apparently, the USPS is not aware that our President would like us to conserve energy.

The proposed closures are nonsensical. Requiring the use of public transportation by customers to receive postal services they currently walk to, at an additional cost, is frighteningly tone deaf. Removing key pieces of vibrant and thriving communities is absurd. Small businesses, which we are told will be the key to economic recovery, thrive in all 3 areas and depend on these branches. They are such key neighborhoods in our City that our public library has committed millions of dollars to 2 new branches which are within 300 yards of 2 of the stations proposed for closure. One new branch opened last month, the other will open in the spring.

And there are a host of other reasons why these proposed closures are ill advised.

However, what is perhaps most repugnant about the proposed closures is the lack of transparency and openness surrounding the closure process. I am sure the story of the proposed Albany closures is not an anomaly.

There simply appears to be no accountability required of the USPS.. It's as if the USPS has decided .. it is the USPS.. it can do what it wants...whenever it wants.. to whomever it wants. Sort of like Divine Right or maybe AIG... To use the vernacular these days...

the Post Office seems to have positioned itself as too big to fail, It gets to be public sector when it wants, but then can fall back under the veil of private corporation when it is convenient. Shame, shame, shame.

I do have to give the USPS props for going through the motions... but since it doesn't really matter... it doesn't seem to care enough to try to adhere to its own processes and procedures, and get it right.

For example, there were public hearings. Alas, the hearing I attended was a joint hearing for the closure of 2 stations. Not really optimal, since it pitted 2 sets of stakeholders against one another. The hearing was held in what are traditional work hours for most folks. The hearing site was not readily accessible by public transportation to the customers of one of the branches slated for closure. And the local newspaper had an article the day after with statements from a woman in a wheelchair who indicated she could not attend the hearing because the site was not ADA compliant. AND STILL 150 SHOWED UP AT THE HEARING.. all of whom vociferously indicated that the proposed closures would have devastatingly negative effects.

Attendees at the hearing requested that USPS officials provide them with the methodology, data and criteria to be used to make the closure decisions. Nothing was forthcoming; we were told they did not know.. The only message that was clearly conveyed was that the proposed closures are cost savings devices. Insofar as the USPS policy and guidelines indicate that no branch should be closed or consolidated simply to save money, perhaps some remedial work with local officials is necessary, since they clearly spilled the beans.

But apparently neither rain, nor snow or nor sleet or nor public sentiment deters the USPS from its appointed rounds... and 15 days later... our 3 local post offices still remained on the closure list.

Given my level of frustration, I filed a freedom of information request with the USPS requesting specific information on the methodology, data and criteria to be used to decide to close these 3 stations. It did not respond timely, and when it did, I was 1) referred to general USPS guidelines for discontinuance (what a lovely euphemism, eh?) and 2) told that specific information did not have to be provided since it was covered under exemption 5 of FOIA requirements. So much for openness, transparency and accountability. I can only imagine the lawyers in the USPS Counsel's Office in Connecticut, from which the contents of my epistle emanated, having a hearty ha ha about how to blow off the woman in Albany who had the effrontery to file a FOIA.

I examined the USPS Guide in great detail and was struck by 3 things. First the Guide contains no specific criteria to be used to determine whether closure will have a negative effect on a community's residents or businesses. It refers to general areas to be reviewed, but provides little specific guidance on how these areas are to be reviewed to determine whether closure is warranted... with one exception... the fiscal impacts/

Seriously.... a local Postmaster could just make it up and no one would be the wiser when it was submitted to Washington, where the final decisions about closure are made. If he or she decides that it is reasonable to expect a 75 year old woman to walk an extra ½ mile over icy, snow laden sidewalks and heavily trafficked streets to send a Christmas package via first class international mail to Poland, that apparently is acceptable. Or maybe he never even thought about that woman – I don't know which is worse. That is one of the major problems... there is no human face on these actions.

If the local Postmaster, such as the one in the Albany District, is blissfully unaware that massive road construction may have contributed to temporary decline in revenue at one branch, that's ok too. And should the community point this out... well, why let facts get in the way of the mission.

But the worst is yet to come.... The sections of the Guide that direct postal officials on how to respond to customer comments in its proposal for closure and final decision conveyance are offensive (Exhibits 335, 336, 352.1 and 432.31 in particular) are offensive. Essentially, the Guide outlines a process and tips on how to discount and disregard and minimize almost all customer concerns... and it goes on and on and on. Truly they are the most detailed sections of the Guide. Would that the USPS had devoted more time and effort to providing guidance on appropriate data, criteria and the overall decision making re: closure and/or consolidation. (There is, however, detailed information on how to calculate expenses and revenue.. surprise, surprise, surprise.)

The point is that the USPS, when it comes to “discontinuance”, depends on the local Postmaster and staff to: 1) intuitively know what is reasonable and acceptable in terms of walkability, access to and cost of public transportation, traffic congestion at alternative sites, % of users who have private autos, % of users who depend on money orders since they do not have credit cards or checking accounts, etc; 2) know what is going on in a community (like increases in immigrant populations who depend on the USPS), etc. and 3) do the right thing. There are no checks and balances. No need to validate data, etc. No mechanism or requirement for real input from the customers who are the stakeholders... who know their local communities and their needs.

THERE MUST BE A REMEDY.

Sincerely,

Julie O'Connor  
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