

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Investigation of Suspended Post Offices

Docket No. PI2010-1

REPLY COMMENTS OF THE PUBLIC REPRESENTATIVES

(April 1, 2010)

On March 2, 2010, the Public Representatives filed their Initial Comments in this proceeding.¹ Pursuant to Order No. 335, they hereby file their Reply Comments.²

I. BACKGROUND

As of March 2, 2010, thirty comments were filed in this docket in addition to the comments filed by the Public Representatives. Attachment A sets forth a list of those comments. In addition, numerous individuals or entities submitted comments to the Commission in various forms that failed to meet the Commission's filing requirements for inclusion in the formal docket. Those latter comments were initially placed in an associated Public Commenter File. Attachment B contains a list of the communities whose post offices were the subject of those comments. The Postal Service did not file initial comments.

On March 9, 2010, the Public Representatives moved to incorporate the Public Commenter File comments into the formal docket.³ The March 9 motion is still pending. Also pending is a March 17, 2010 motion by the Public Representatives that seeks to

¹ Initial Comments of the Public Representatives, March 2, 2010 (Public Representatives' Initial Comments).

² PRC Order No. 335, Notice and Order Providing an Opportunity to Comment (November 9, 2009) (Order No. 335).

³ Motion of the Public Representatives to Include Public Comments in Docket, March 9, 2010. Attached to the motion was a two-part attachment (Attachment-Part A and Attachment-Part B) containing copies of the Public Commenter File comments proposed for inclusion in the formal docket. Each page of the two-part attachment was stamped for identification with a Bates Number. Citation to the comments contained in Attachment-Part A and Part B will be made by reference to the applicable community and Bates Number. For example, a comment addressing an emergency suspension of the Childwold, NY Post Office at Bates Number 000004 would be cited as "Public Commenter File, Childwold, NY at 4."

make public certain information originally provided to the Public Representatives by the Postal Service on a confidential basis.⁴ This latter information was filed under seal by the Public Representatives in connection with their Initial Comments.⁵ In its answer to Public Representatives' March 17 motion, the Postal Service conceded that all but one of the categories of information previously provided to the Public Representatives should be made public.⁶ With respect to that remaining category, the Public Representatives withdrew their motion.⁷ Notwithstanding the withdrawal of the Public Representatives' Show Cause Motion, the controversy over whether this last category of information should be accorded confidential treatment remains unresolved.⁸

In their Initial Comments, the Public Representatives summarized the statutory, regulatory, and administrative framework that applies to emergency suspensions of post offices. The Public Representatives also presented information obtained from the Postal Service regarding the number and status of post offices whose operations were the subject of emergency suspensions.⁹ In these reply comments, the Public Representatives will address points made by other participants in their March 2, 2010 initial comments and will update the tentative recommendations made by the Public Representatives in their Initial Comments.

II. THE INITIAL COMMENTS OF OTHER PARTICIPANTS

In addition to the comments of the Public Representatives, initial comments have been filed by essentially four classes of commenters: postal customers, state and local government officials, an association of post office lessors, and postmaster associations.

⁴ Motion for Order Directing the Postal Service to Show Cause Why Exhibit F and Exhibit H to the Initial Comments of the Public Representatives Should Not Be Made Public, March 17, 2010. On March 18, 2010, the Public Representatives filed an errata to the March 17, 2010 motion correcting an incorrect docket number in the caption of their prior pleading.

⁵ See Notice of the Public Representatives of filing of PR-PI2010-1-NP1, March 2, 2010.

⁶ Opposition of the United States Postal Service to the Motion for Order Directing the Postal Service to Show Cause Why Exhibit F and Exhibit H to the Initial Comments of the Public Representatives Should Not Be Made Public, March 24, 2010.

⁷ See Reply of the Public Representatives to Opposition of the United States Postal Service to the Motion for Order Directing the Postal Service to Show Cause Why Exhibit F and Exhibit H to the Initial Comments of the Public Representatives Should Not Be Made Public, March 25, 2010.

⁸ See Application of the United States Postal Service for Nonpublic Treatment of Materials, March 25, 2010; and David B. Popkin Opposition to the Application of the USPS for Non-Public Treatment of Materials, March 26, 2010.

⁹ See Public Representatives' Initial Comments Exhibits G-H.

Postal customers consist of individuals, business owners, and ad hoc associations interested in the post offices that have historically served their members.¹⁰ State and local government officials include both elected officials and officials responsible for providing local governmental services.¹¹ The post office lessors association represents over 3,300 post office lessors nationwide.¹² The postmaster associations represent both existing and retired postmasters.¹³ The overwhelming majority of commenters seek to have their suspended post offices re-opened.¹⁴

Some of the comments address post offices that have been suspended, but were not included in the information provided to the Public Representatives by the Postal Service and were therefore not included in Exhibit G to the Public Representatives' Initial Comments.¹⁵

Furthermore, some commenters have discussed post offices suspended for reasons other than lease termination, the specific purview of this docket. However, comments in this case have made clear that the term "lease termination" is a subjective rationale for a suspension. The Postal Service provides many rationales for suspension, even in the case of lease termination, as show in non-public Exhibit F to the Initial Comments of the Public Representatives. These justifications range from disaster to health and safety concerns, and it is unclear when safety concerns lead to a lease termination.

It is also unclear that suspensions for safety concerns and suspensions for lease terminations can be strictly compartmentalized in all cases, as demonstrated by the suspension of the Horse Branch, KY post office. The suspension of that latter post office appears to have resulted from the Postal Service's termination of a lease triggered by an alleged safety concern.¹⁶ For his part, the landlord asserts that the Postal Service relied upon a safety concern that, by the time of the lease termination and emergency suspension, had allegedly existed for two years—a safety concern that

¹⁰ *E.g.*, Harmony, CA Comments; Prairie City, SD Comments #2; and Hacker Valley, WV Comments.

¹¹ *E.g.*, Public Commenter File, National Governors Association at 241.

¹² See comments of The Association of United States Post Office Lessors (AUSPL) at 242-246.

¹³ *E.g.*, NAPUS Comments and National League of Postmaster Comments.

¹⁴ *Cf.* Public Commenter File, Rector, PA at 170.

¹⁵ Those additional post offices are located in Hoover, OH; Horse Branch, KY; Lakeland, FL; Laketon, IN; and Port Byron, IL.

¹⁶ Public Commenter File, Horse Branch, KY at 46-78.

the landlord claims he had not previously be told about.¹⁷ In effect, the landlord appears to claim that an undisclosed safety concern was used as a pretext for a lease termination that was then parlayed into an emergency suspension. Even if the Postal Service were correct in asserting that the safety concern had existed for two years, it is unclear why it suddenly became an emergency requiring termination of the lease and an emergency suspension. Another commenter, a former postmaster, suggests that the Commission carefully examine lease negotiation timelines, suggesting that the Postal Service may sometimes delay the commencement of negotiations in order to precipitate an emergency requiring a suspension.¹⁸

Many of the post office patrons opposed to emergency suspensions argue passionately against the suspension of their post office. They claim that suspension of their post office: requires them to drive excessive distances to obtain basic postal services;¹⁹ subjects them to discrimination not suffered by other postal customers;²⁰ makes access to postal services hazardous during severe weather;²¹ provides them with inferior and inadequate postal services;²² jeopardizes public safety;²³ makes the mail less secure;²⁴ has an adverse impact on businesses;²⁵ adversely impacts a town's identity;²⁶ creates confusion over ZIP Codes and thereby adversely affect real estate transactions, insurance rates, and the reliability of mail service;²⁷ needlessly disadvantages the elderly and disabled;²⁸ and reduces postal volumes and revenues.²⁹

¹⁷ *Id.* at 46 and 49-50.

¹⁸ See Webster, NC Comments at 2.

¹⁹ *E.g.* Public Commenter File, Childwold, NY at 1 and 3-4; Granite Canon, WY at 34; Midland, OH at 94 and 94-A; Noxen, PA at 131; Rector, PA at 155, 172, and 176; and Spring Run, PA at 225. Crescent Lake, OR Comments #1 at 2; and Hacker Valley, WV Comments at 3.

²⁰ *E.g.* Public Commenter File, Noxen, PA at 147; and Rector, PA at 161, 173, and 201.

²¹ *Id.*, Noxen, PA at 134 and 136; and Rector, PA at 159 and 176. Crescent Lake, OR Comments #1 at 2.

²² *Id.*, Rector, PA at 159, 171, and 178. Crescent Lake, OR Comments #1 at 2; Laketon, IN Comments at 2; Sunderland, MD Comments at 1; and Whitmer, WV Comments at 1-2.

²³ *E.g.* Public Commenter File, Rector at 188; Spring Run at 232; Crescent Lake, OR Comments # at 4.

²⁴ *E.g.* Public Commenter File, Rector at 192.

²⁵ *E.g.* Public Commenter File, Noxen, PA at 134 and 139; Port Byron, IL at 154; and Rector, PA at 172-173. Oakdale, IA Comments at 1.

²⁶ *Id.*, Noxen, PA at 139-40, and 147; Port Byron, IL at 153; and Rector, PA at 155, 159, 176, 187, and 193

²⁷ *E.g.* Crescent Lake, OR Comments #1 at 2.

²⁸ *E.g.* Public Commenter File, Childwold, NY at 3-4; Grantsburg, IN at 45; Hamburg, MI at 83; Midland, OH at 94; and Rector, PA at 155, 159, 171, 179, and 181. Whitmer, WV Comments at 2.

²⁹ *Id.*, Rector, PA at 172-73, 178, 190, and 193. Sunderland, MD Comments at 1.

For these and other reasons, the opponents of suspensions urge that their post offices be reopened either in the prior facility or in an alternate facility.³⁰

The arguments advanced by commenters supporting a reestablishment of post offices in their cities, towns, and rural areas deserve fair consideration. However, the purpose of this proceeding is not to rule on the merits of whether any particular post office should be reopened.³¹ Rather, the objective of this proceeding is “to develop further information on the status of ... suspended [post] offices and the Postal Service practice of suspending [post] offices for extended periods without affording the public the rights guaranteed by 39 U.S.C. 404(d).” Order No. 335 at 2.

A key threshold issue is whether, as suggested by some commenters, extended and indefinite suspension have, indeed, become *de facto* discontinuances which should trigger the right of appeal to the Commission under section 404(d). Information submitted as part of the Public Representatives’ Initial Comments supports the position of those commenters who assert that a discontinuance of their post office’s operations has occurred.³² For example, a post office whose operations have been suspended for over 20 years has been discontinued. No one can seriously argue otherwise. Shorter suspensions might, or might not, be *de facto* discontinuances. What the Commission needs is a set of criteria for assessing when, in fact, an emergency suspension becomes a discontinuance. The mere labeling by the Postal Service of a closure as “an emergency suspension” does not necessarily prevent the Commission from concluding that a discontinuance has occurred.

If a determination is made that a discontinuance has occurred, an equally important, and perhaps even more difficult, question is how the Commission should deal with such a *de facto* discontinuance. For example, if an extended emergency suspension is appealed by customers and the Commission accepts the appeal, how

³⁰ See Public Commenter File *passim*.

³¹ While the alleged impacts identified by commenters are properly the subject of a Postal Service discontinuance study, see e.g. Section 32 of the Discontinuance Handbook (discontinuance proposal “must include an analysis of the effect the proposed discontinuance might have on the community served”), and, perforce, Commission review under section 404(d) of a final Postal Service discontinuance decision, the Commission need not resolve these allegations until it first determines that a discontinuance has occurred. The focus of the current investigation is on that threshold issue. Nevertheless, commenters’ allegations of adverse impact are an important indicator of the significance of an emergency suspension for customers and their communities.

³² See Public Representatives’ Initial Comments at 9-12.

would such an appeal proceed? The Postal Service might, or might not, have an administrative record for filing. Could an administrative record be created by means of discovery? And, if the Commission were ultimately to conclude that an unlawful discontinuance had occurred, what remedies would be available? These and other related questions go beyond the scope of the present inquiry. As discussed below, the Public Representatives suggest that the Commission's inquiry be continued to explore these and other related questions.

With regard to the stated focus of this investigation, *viz.*, the Postal Service's suspension practices and the status of suspended post offices, a number of initial comments have provided detailed information.

- Several commenters questioned whether there was a true emergency requiring an emergency suspension.³³ If true, this is a violation of Section 611 of the Post Office Discontinuance Guide , Handbook PO-101 (Discontinuance Handbook).
- Commenters from five communities challenged the adequacy of the suspension notice.³⁴ One of those commenters claimed that it was necessary to file a Freedom of Information Request to obtain a copy of the suspension notice.³⁵ If true, this is a violation of Section 613.3 of the Discontinuance Handbook.
- Other commenters questioned the adequacy of the reasons given for the suspension.³⁶ If true, this is a violation of Section 611 of the Discontinuance Handbook.
- Several commenters alleged that they were never given an adequate opportunity to address the suspension or alternatives to the suspended facility.³⁷ If true, this is a potential violation of Section 614 of the Discontinuance Handbook.
- Commenters from two communities alleged that representatives of the Postal Service failed to return their calls, provide requested information, or be responsive to the community.³⁸ If true, this is inconsistent with the spirit, if not the letter of, Section 614 of the Discontinuance Handbook.

³³ *E.g.* Public Commenter File, Keezletown, VA. Laketon, IN Comments at 2. See Oakdale, IA Comments at 1.

³⁴ *E.g.* Public Commenter File, Rector, PA at 159; Granite Canon, WY at 35; and Grantsburg, IN at 41. Crescent Lake, OR Comments #3 at 2; Whitmer, WV Comments at 1.

³⁵ *E.g.* Public Commenter File, Granite Canon, WY at 35.

³⁶ *E.g.* Public Commenter File, Grantsburg, IN at 44; and Horsebranch, KY at 58.

³⁷ *E.g.* Laketon, IN Comments at 2; St. George, WV Comments; and Whitmer, WV Comments at 1.

³⁸ *E.g.* Public Commenter File, Rector, PA at 161. Crescent Lake, OR Comments #1 at 1.

- Other commenters accused Postal Service representatives of providing false or misleading information.³⁹ If true, this is inconsistent with the spirit, if not the letter of, Section 614 of the Discontinuance Handbook.
- Three commenters expressed confusion over whether their post office had been suspended or closed.⁴⁰
- When their efforts to obtain information or to engage the Postal Service in a discussion of the suspension went unanswered, several communities engaged in what appear to have been extensive efforts to obtain assistance from their Congressmen and Senators.⁴¹
- Several communities claimed to have identified alternate facilities suitable for a post office; offered grants of land; and even offered to build a new post office to Postal Service specifications. None of these offers was accepted.⁴² It is unclear whether, in some cases, serious consideration was ever given to these alternatives.⁴³
- In one case, the building in which a post office had operated for years prior to suspension was purchased by a new owner and rehabilitated to pre-suspension Postal Service specifications, but was rejected by the Postal Service on the grounds that new, stricter specifications apply to facilities vacated by the Postal Service following a suspension.⁴⁴ If true, this suggests that suspensions are being utilized to impose new facility specifications on existing post offices as a means of preventing continued use of such existing post office facilities.
- Several communities alleged that their questions, suggestions, and requests were either ignored or rejected out of hand leaving the impression that the suspension of their post office was, in reality, a discontinuance.⁴⁵ If true, this is inconsistent with the spirit, if not the letter of the Discontinuance Handbook.

³⁹ *E.g.* Claremont, SD Comments at 2; and Crescent Lake, OR Comments #1 at 1.

⁴⁰ *E.g.* Public Commenter File, Keezleton, VA; and Granite Canon, WY, at 33. Sunderland, MD Comments at 1.

⁴¹ *E.g.* Public Commenter File, Noxen, PA at 110, 113, and 120; and Midland, OH at 93. Claremont, SD Comments *passim*; Hacker Valley, WV; and Export, PA.

⁴² *Id.*, Midland, OH at 94-A; Noxen, PA at 116, 125, 134, 149-50; Port Byron, IL at 151; and Rector, PA at 162, 171, and 175; Keezletown, VA Comments; Sunderland, MD Comments at 1; and Whitmer, WV Comments at 1.

⁴³ See NAPUS Comments, January 12, 2010 at 2.

⁴⁴ See Claremont, SD Comments (September 2, 2009 letter to Senator Tim Johnson from Manager, Post Office Operations, Huron, SD; and September 14, 2009 letter to District Manager, Sioux Falls, SD from Ms. Wanette Lenling).

⁴⁵ *E.g.* Howell Comments at 2.

In addition, postmaster organizations assert generally that they are being excluded from participation suspension review teams required by Section 616 of the Discontinuance Handbook.⁴⁶

The foregoing allegations, when coupled with extended suspensions and the failure to institute discontinuance proceedings, strongly suggest that the suspension process is being misused to produce *de facto* discontinuances. It appears that at least one district manager, the District Manager of the Claremont, South Dakota Post Office, has admitted that emergency suspensions are being used to circumvent the discontinuance process:

With the number of business challenges we face, most notably the decline in mail volume, we are evaluating every facet of our organization and operations to ensure we are remaining fiscally responsible with the monies entrusted to us. Based on our financial obligations and current situation, we find it would be cost prohibitive and fiscally irresponsible to move forward with any new facility project at this time. [Emphasis added].

This statement was included in a letter from the District Manager to Senator Tim Johnson (R-SD) dated October 6, 2009.⁴⁷ As of March 2, 2010, the date initial comments were filed by The Committee to Save the Claremont Post Office, the Claremont Post Office was still in suspension and discontinuance proceedings had not been instituted notwithstanding the fact that a decision appears already to have been made to close the Claremont Post Office. *Id.*

While an attempt might be made to characterize criticisms of the suspension process contained in the public's March 2, 2010 initial comments as "anecdotal," such criticisms cannot be casually discounted. First, similar complaints are made by different commenters with respect to the suspension of a number of different post offices. At a minimum, this similarity suggests that each of these cases is part of a broader and consistent pattern. Second, the Postal Service has yet to offer any facts or information that would support the assertion that the cases described by commenters are isolated or aberrations. Unless and until such information is presented, it is fair to infer that the

⁴⁶ National League of Postmasters Comments at 12.

⁴⁷ See Claremont, SD Comments.

descriptions of Postal Service suspension practices presented in the initial comments filed March 2, 2010, are not uncommon.

III. RECOMMENDATIONS

In their Initial Comments, the Public Representatives presented 7 recommendations for Commission consideration. Public Representatives' Comments at 16-18. Six of the 7 recommendations were tentative, pending receipt and evaluation of the initial comments of other participants. The tentative recommendations were presented to provide the Postal Service and others an opportunity to address those recommendations in their reply comments.

Having evaluated the initial comments of other participants, the Public Representatives hereby submit the following updated recommendations. First, the Commission should adopt Recommendations A, B, C, and E, revised to read as follows:

Recommendation A:

The Commission should continue its investigation of Post Office suspensions and should require the Postal Service to provide additional information of the type previously requested by the Public Representatives and the National League of Postmasters.⁴⁸

Recommendation B:

The Commission should recommend greater oversight of the suspension/discontinuance process by Postal Service Headquarters personnel, including more uniform implementation of the suspension/discontinuance procedures from district-to-district.

Recommendation C:

The Commission should require the Postal Service to report on the status of its efforts to ensure compliance with the procedures required by the Discontinuance Handbook.

⁴⁸ At a minimum, information is needed from the Notice of Post Office Emergency Suspension, the Official Record Index, and the log of Post Office Discontinuance Action for each Post Office listed on Exhibit F (Non-Public) and/or covered by Exhibit G to the Public Representatives' Comments. The information contained on Exhibit F (Non-Public) also needs to be reconciled with the information on contained on Exhibit G. Finally, the parties should be given access to the Postal Service Discontinuance Tracking System referred to in Exhibit G.

Recommendation E:

With respect to Post Offices that have already been subjected to suspensions, the Commission should require the Postal Service to report regularly on the status of the efforts to either lift the suspension or proceed with a discontinuance study.

Second, the Commission should also adopt the following additional recommendations:

Recommendation H:

The Commission should invite the Postal Service to present an explanation of how it intends to deal with the backlog of emergency suspensions, including any steps that address customer complaints or requests for interim service improvements.

Recommendation I:

The Commission should solicit comments on what types of statutory, regulatory, or administrative changes would facilitate the resolution of the emergency suspension backlog problem and would prevent a recurrence of such backlogs.

Third, the Commission should defer action on the following 3 recommendations that were presented in the Public Representatives' initial comments:

Recommendation D:

That the Commission consider the possibility of reporting to Congress on the results of its investigation of the suspension process, including possible legislation that would prevent the use of suspensions as *de facto* discontinuances.

Recommendation F:

That the Commission consider issuing orders to show cause why Post Offices whose operations have been suspended for more than 10 months should not be considered discontinued and ripe for review.

Recommendation G:

That the Commission treat all future suspensions as discontinuances and therefore subject to review, unless the Postal Service demonstrates that an emergency within the definition of the Discontinuance Handbook exists and that the Postal Service is complying with the applicable procedures of the Discontinuance Handbook.

These last three recommendations deferred in order to give the Commission first to assess the results of implementing Recommendations A, B, C, E, H, and I.

IV. CONCLUSION

The Postal Service is attempting to deal with a very serious financial crisis. Its most recent proposal to reduce mail deliveries from 6 to 5 days per week. That proposal is described in a request for an advisory opinion filed in Docket No. N2010-1.⁴⁹ Other steps are being considered, including additional post office closings.⁵⁰

The Public Representatives wish to make clear that they do not oppose the Postal Service's right under present law to close post offices. What the Public Representatives do oppose is any process which circumvents the established procedures for considering and implementing such closures. The correct procedures for closing post offices are contained in the Postal Service's own regulations and administrative procedures. The Postal service has the legal obligation to follow its own procedures and to provide postal patrons and other interested persons with the opportunity to participate in a meaningful manner in the discontinuance process. See *Service v. Dulles*, 354 U.S. 363 (1957).

Circumvention of the discontinuance process undermines the credibility of the Postal Service. Circumvention breeds frustration, public anger, and contempt for one of America's oldest and trusted institutions. The Postal Service, its employees, mailers, recipients of the mail, cities, towns, and rural areas all have an interest in preserving the Postal Service.

⁴⁹ See Request of the United States Postal Service for an Advisory Opinion on Changes in the Nature of Postal Services, March 30, 2010.

⁵⁰ See Statement of John E. Potter Postmaster General/CEO Before the Subcommittee on Financial Services and General Government of the Committee on Appropriations United States Senate (March 18, 2010).

To foster the continuing viability of the Postal Service, the emergency suspension process needs to be cleaned up. The primary responsibility for doing this rests with the Postal Service. The Commission is responsible for overseeing this process. That responsibility is due, in part, to preserve its statutory review authority of post office discontinuances; in part, because of the potential effect of emergency suspensions on service performance; in part, because of the Commission's statutory role in overseeing the Postal Service's Universal Service Obligation; and in part, because of the Commission's responsibility for overseeing the financial condition of the Postal Service in such contexts as the Annual Compliance Determination.

To meet its responsibilities, the Commission should pursue this inquiry further by taking the steps recommended above.

Respectfully submitted,

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Docket No. PI2010-1

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April 1, 2010

PI2010-1 Docket Entry

1. Responses to PRC About Evictions (NAPUS Comments)
2. Save Whitmer, WV Post Office (Whitmer, WV Comments)
3. Letter to PRC from Oakdale, Iowa Post Office (Oakdale, IA Comments)
4. Comments from Paul Ledford Regarding Docket PI2010-1 (Midland, OH Comments)
5. Appeal of Suspension of the Crescent Lake, Oregon Post Office (Crescent Lake, OR Comments #1)
6. Letter from Walter Borla (Howell, UT Comments)
7. Letter to Ann Fisher (St. George, WV Comments)
8. Prairie City, SD Appeal Letter to PRC on Emergency Suspension of Prairie City, SD (Prairie City, SD Comments #1)
Post Office
9. Laketon Letter to Postal Regulatory Commission (Laketon, IN Comments)
10. Mark Jamison Comments Pertaining to Docket No. PI2010-1 (Webster, NC Comments)
11. Letters from the Community Regarding the Closure of Prairie City, SD Post Office (Prairie City, SD Comments #2)
12. Letter from Robert Kirk Regarding Piercy, CA Post Office (Piercy, CA Comments)
13. Letter from Aarika Wells Regarding Harmony, CA Post Office (Harmony, CA Comments)
14. Letter from Frank Radosevic Regarding the Sunderland, MD Post Office (Sunderland, MD Comments)
15. Letter from Robert Wilson Regarding the Port Byron, IL 61275 Post Office (Port Byron, IL Comments)
16. Letter from Tim Robinson Regarding the Leon, VA 22725 Post Office (Leon, VA Comments)
17. Letter from Renee Anderson Regarding Hacker Valley, WV Post Office (Hacker Valley, WV Comments)
18. Letter from Richard Carlson on behalf of Steven K. Stewart, President, Central Cascades Fire and EMS Board of Directors, Investigation Of Suspended Post Offices (Crescent Lake, OR Comments #2)
19. Export Borough Post Office Suspension (Export, PA Comments #1)
20. Addendum to the Suspension of the Crescent Lake Oregon Post Office filed January 2010 (Crescent Lake, OR Comments #3)
21. Response and Research Regarding Alleged Closure of the Crescent Lake Oregon Post Office (Crescent Lake, OR Comments #4)
22. Letter to Commission from Bill & Gloria Gibbs Regarding Suspension of Crescent Lake, Oregon Post Office (Crescent Lake, OR Comments #5)
23. Comments from Colleen DiPaul Regarding PI2010-1 Docket (Rector, PA Comments)
24. Letter from Lawanda Corman Regarding the Hoover, OH 45033 Post Office (Hoover, OH Comments)

25. Letter from Carol Goevelinger Regarding the Crescent Lake Oregon Post Office Docket PI2010-1 (Crescent Lake, OR Comments #6)
26. Letters of Support for Export Borough (Export, PA Comments #2)
27. Re: Executive Summary of the Appeal of the Suspension of Crescent Lake Oregon Post Office Docket PI2010-1 (Crescent Lake, OR Comments #7)
28. Letter from Glendon Geary Regarding the Horse Branch KY Post Office (Horse Branch, KY Comments)
29. Letter from Judy Pierson Regarding the Claremont, SD 57432 Post Office (Claremont, SD Comments)
30. Comments of the National League of Postmasters (National League of Postmaster Comments)

PUBLIC COMMENTER FILE – DOCKET NO. PI2010-1
POST OFFICES ON WHICH COMMENTS WERE FILED

<u>POST OFFICE</u>	<u>BATES NUMBERS</u>
CHILDWOLD, NY 12922	000001-000005
CRESCENT LAKE, OR 97733	000006-000026
EXPORT, PA 15632	000027-000029
GRANITE CANON, WY 82059	000030-000039
GRANTSBURG, IN 47123	000040-000045
HORSE BRANCH, KY 42349	000046-000078
HACKER VALLEY, WV 26222	000079-000082
HAMBURG, MI 48139	000083-000085
JOSEPHINE, PA 15750	000086
KEEZLETON, VA 22832	000087
LAKELAND, FL 33806	000088-000089
LEON, VA 22725	000090-000092
MIDLAND, OH 45148	000093-000094A
NOXEN, PA 18636	000095-000150
PORT BYRON, IL 61275	000151-000154
RECTOR, PA 15677	000155-000221
SMITHBORO, NY 13840	000222-000223
SPRING RUN, PA 17262	000224-000234
WEBSTER, NC 28770	000235-000238
ZIONSVILLE, PA 18092	000239-000240
MISCELLANEOUS	000241-000248