

## AUSPL Comments for Public Inquiry into Post Office Suspensions

- We feel the current process in place works. As prescribed by law, there is an appeal procedure whereby citizens, ratepayers, and other stakeholders can appeal the USPS closing decision to the PRC. This does not preclude closing a Post Office where the demonstrated need to close is made evident. However, it gives all stakeholders the opportunity to be heard and assures that Postal Management is accountable in a transparent fashion for such decisions.
- We also feel that the more inconvenient you make access to Postal Service products and services, the more likely you are to lose customer loyalty. Rural areas and relatively low income areas are disproportionately impacted given their larger dependency on USPS for personal and business communications.
- There is definitely an economic impact from closing or consolidating Post Office locations, particularly in communities that are already struggling to maintain their business cores. The loss of presence, jobs, and additional commercial vacancy is an adverse impact during a period when “Government” has been stressing the need to provide stability and stimulus.
- USPS has a pattern of being non responsive to requests for clarification or discussion on issues affecting AUSPL members.
- USPS insisting on termination clauses when renewing leases: If lessors don’t agree to this clause, they may face a threat to close the facility under the guise of failure to negotiate a reasonable lease. Such termination clauses trade away the “Credit Tenant” nature of a Postal Service lease.
- USPS insisting on below market rates for buildings. Some as low as twenty percent.
- USPS does not always timely respond to inquiries from lessors after they submit a signed lease agreement and will frequently reopen negotiations.

*Note: It appears these issues are a strategic attempt to place lessors in the position of being blamed for PO closings. We are willing to do our share of the “heavy lifting” to help the USPS survive and thrive, but all the resources of production need to be asked to carry their share as well. The total annual rental budget for the USPS will not cover one bi-weekly payroll requirement.*

- USPS does not always seek alternate quarters before emergency suspending service at a small post office. It is a requirement that a reasonable attempt be made to seek alternate quarters.

- USPS emergency suspensions are not always justified.
- USPS does not always make an earnest attempt to hire a person to operate a small post office open fewer than eight hours a day.
- USPS frequently engages in selective enforcement of real estate guidelines in order to justify emergency suspending small post offices.
- USPS does not always organize a Review Team consisting of postal representatives and postmaster association representatives prior to emergency suspending service.
- USPS frequently does not implement the permanent discontinuance process or does not implement the process until much time has elapsed after emergency suspending a post office. This deprives affected customers of their rights to have their comments/concerns be considered by the Postal Service in a timely manner and impacts negatively on their appeal rights to the PRC. We believe that this violates the spirit and intent of the federal law dealing with the discontinuance of post offices.
- We want to be constructive and work within the system to enhance the USPS ability to survive and thrive. We want to be a part of the solution, not a part of the problem! We have invested many years and many dollars in our investments into USPS leased properties....trying to promote a public-private partnership serving the American public, the rate-paying stakeholders.