

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

<i>In the Matter of:</i> Gwynedd Post Office (Branch) Gwynedd, PA 19436 Christina Surowiec, Petitioner	Docket Number A2011-15
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**INITIAL BRIEF IN SUPPORT OF PETITION**

(June 7, 2011)

In support of the previously filed Petition filed appealing the Postal Service's decision to close the Gwynedd, PA 19436 branch of the North Wales Post Office, commonly known as the Gwynedd Post Office, the Petitioner respectfully submits the following brief and supporting materials to the Postal Regulatory Commission:

Statement of Jurisdiction

This Commission has jurisdiction on this matter pursuant to 39 U.S.C. §404(d)(5). Petitioner's initiation of this appeal was received by the Commission on May 3, 2011 following the Postal Service's Final Determination to close the Gwynedd Post Office issued April 4, 2011.

Summary of Arguments by Petitioner

Petitioner herein argues:

- (1) that the Postal Service did not follow the procedures authorized in 39 CFR §241.3 when it acted to close the Gwynedd Post Office;
- (2) the determination to close the Gwynedd Post Office was arbitrary and capricious;
- (3) the Postal Service did not present adequate or correct evidence to justify the closure.

## Background of the Appeal

Petitioner intends to show both procedural missteps and factual misstatements by the Postal Service in its closing of the Gwynedd Post Office. Two timelines are relevant here. The first is the long-term timeline of a large road project, the reconstruction of U.S. Route 202, which pertains to this matter because the Gwynedd Post Office is located at the intersection of U.S. 202 and Meeting House Rd. The other timeline concerns the specific actions taken by the Postal Service in its closure process, initiated when Gwynedd P.O. box holders received a communication from the North Wales postmaster, dated February 15, 2011, announcing a proposal to terminate services at this location permanently.

A key point of contention between the petitioner and other residents faced with the closure of the Gwynedd Post Office, on one hand, and the Postal Service on the other hand, is what went on at a public meeting held at the Lower Gwynedd Township municipal building on March 3, 2011. Petitioner has already submitted to the PRC and USPS attorneys an affidavit signed and dated May 19, 2011 laying out some objections to the Postal Service's statement and interpretation of facts germane to the matter at hand. In part, this affidavit represented an initial reply to the USPS filing of May 18 ("Notice of United States Postal Service") with the PRC in the current case. Petitioner will elaborate on those contentions in this brief. In addition, petitioner is submitting another affidavit, the text of which is attached herein as Appendix A, giving her best recollection of the March 3 meeting.

No audiotape of the meeting exists, or at least no such tape is known to exist. The USPS has been completely unresponsive to requests to provide copies of the notes one of its representatives was seen taking at the meeting, or an explanation of what happened to those notes. The only USPS administrative record pertaining to this matter made known to date is what appears in its Final Determination, submitted to the Commission on May 18. Petitioner challenges both the accuracy and

the completeness of the statements listed as residents' "Concerns" in the text of the USPS Final Determination.

The purpose of revisiting the March 3 meeting is to demonstrate that the Postal Service had decided upon closure before receiving any public input, and also to show that the text of the USPS Final Determination does not accurately convey many of the concerns that affected residents expressed at the meeting.

Finally, there is a long, knotty, and (to the petitioner) not fully decipherable historical chain of events involving private interests and local government which petitioner acknowledges are not directly relevant to the present appeal. However, these circumstances seem to have induced widespread misperceptions among local residents about the status of the Gwynedd Post Office. A summary of what is known to the petitioner retracing these matters is presented in Appendix C.

#### Outline of Brief and Appendices

1. The first argument, based on testimony at the March 3 public meeting, is that the Postal Service was already fully committed to closing the Gwynedd Post Office when it first notified residents that this was a possibility. The solicitation of public input was thus a sham to present the appearance of conforming to required procedure.

2. The second argument is that closing the Gwynedd Post Office is arbitrary and capricious. The cessation of service at the Gwynedd Post Office or branch is not in the interest of affected local residents and box holders, but if it is justified in other ways, local residents would have to accept it and adapt. However, the PRC should intervene to stop closures that are not in either USPS' interest or local residents' interest. Otherwise, the Postal Service can quietly arrange closures that mainly serve to benefit other private interests, regardless of the effect on postal business volume as well as on the community. Petitioner takes no position on whether this has taken place here. The fact that the Postal

Service has moved through at least three separate justifications, selectively emphasizing different ones during the determination and contestation of this matter, does not on its face argue for the transparency of the process, nor does it bespeak well-considered rational grounds for the closure.

3. The final argument against the closure, and the one on which petitioner places the most weight, is that the Postal Service failed to show how this consolidation would improve its financial position. Indeed, the Gwynedd Post Office was a net generator of revenue for USPS, even with limited service hours and other service problems community members spoke of at the March 3 public meeting. Furthermore, the Postal Service should value its only site on a major U.S. highway, now undergoing a major upgrade, along a 17.5 mile stretch connecting the county seat cities of Norristown and Doylestown. This location, with its high exposure to through traffic, has better potential to draw non-resident customers than any other Postal Service facility in the general area. Closing it seems likelier to exacerbate rather than reduce the ongoing loss of business volume USPS is experiencing. At the very least, the PRC should demand that USPS perform a legitimate economic impact study reflecting these considerations. The Final Determination by USPS does not begin to do this.

Arguments Against Closure of the Gwynedd Post Office (or Branch) by USPS

1. **The Postal Service arranged for the appearance of community input during the closure process but was actually fully committed to closure beforehand.** One of the speakers at the March 3, 2011 public meeting at the Lower Gwynedd Township municipal building, the president of the local chapter of the postal workers' union, indicated that USPS district officials were already acting to close Gwynedd Post Office and dismantle the boxes at the same time that box holders were just being notified that the post office was being considered for closure and invited to a public meeting to discuss the matter. (See Appendix A.)

2. **Closing of the Gwynedd Post Office is arbitrary and capricious.** To eliminate the Gwynedd Post Office is tantamount to allowing the Postal Service to close any facility it wants as long as it is in a metropolitan area. Petitioner recognizes that USPS policy targets reducing the number of facilities in metro areas, while placing a higher priority on retaining locations in rural communities even if the latter show adverse financial performance. (Across a large swath of rural Pennsylvania, the boom in Marcellus shale natural gas drilling is boosting population and economic activity, so the cost-revenue calculation in regard to rural post offices may be unduly unfavorable and out of date. However, petitioner supposes that neither she nor the PRC is in a position to make recommendations on how often the Postal Service should revise its baseline assessment of the financial performance of post offices and branches in all locations.)

In the following section (#3), which will counter multiple assertions made by USPS in its Final Determination to close the Gwynedd Post Office, petitioner intends to demonstrate that the analysis submitted to justify this closure was at best spotty and incomplete, as well as factually incorrect on certain points. The incentive here is not just to insist on a reasonably thorough, complete, and credible analysis of the circumstances prompting closure of a post office branch, though this is a

vital consideration. Petitioner also wishes to observe at this point that a slipshod approach to showing why a proposed post office branch closure is in the economic interest of USPS while potential adverse impact on the interests of the affected community and postal employees will be comparatively minor and tolerable is not just a shortcut without legal authorization. Permitting closures without an accurate presentation and interpretation of the relevant facts also provides an opening for particular private interests, whose identity and agenda may not even be discernable, to be the principal beneficiaries of closure determinations. The letter and spirit of the law specify that post office closures must consider and balance the interests of the Postal Service, its workforce, and the general public. Petitioner respectfully asks the Commission to find that this has not been satisfactorily done in regard to the Gwynedd Post Office closure.

**3. In its Final Determination to close the Gwynedd Post Office, the Postal Service failed to provide an accurate record of the concerns expressed by community residents; it did not state relevant facts completely or interpret them correctly, while including some factually incorrect assertions; and it failed to demonstrate the economic non-viability of the Gwynedd location or show how closing this location would improve the USPS financial position.**

The first part of USPS' May 18 filing with the PRC ("Notice of United States Postal Service") is a generic discussion of the differences between post offices and branches (it mistakenly refers to the Gwynedd branch as a "station"), with reference to a current controversy in which the PRC takes the position that facilities in the more ancillary category (stations and branches) are still commonly thought and spoken of as post offices and thus should be accorded the same legal and regulatory treatment when closures are contemplated as full post offices. By contrast, the Postal Service contends that a more streamlined closure process should apply to stations and branches, with less stringent requirements for public notice and discussion, etc. and more latitude for USPS to act however it

decides. The Postal Service nevertheless states that it is following the PRC directive pending final resolution of this issue, and contends that its closure of the Gwynedd location is fully compliant with requirements to terminate service at a full Post Office, defined as the central mail handling and retail postal facility in an incorporated municipality. Petitioner does not challenge the Postal Service claim that the nominal timeline of notice to customers, public meeting, announcement of a Final Determination and ultimately closure has been met. However, petitioner here reiterates that public input, supposedly sought at a meeting held by USPS representatives at the Lower Gwynedd Township municipal building on March 3, 2011, was an ineffectual fig leaf over the naked reality of a closure decision already made; community members actually had no influence over the Postal Service's previously fixed determination to terminate service at the Gwynedd location. (See point #1 in this section above, and Appendix A.)

Exhibit 1 of USPS' May 18 filing is the actual text of its Final Determination to close the Gwynedd location. The opening section gives dollar figures demonstrating a decline in receipts, but makes no mention of a severe cutback in hours that coincides with this drop. Another factor influencing patronage at the Gwynedd Post Office during the last year or so is an intense phase of the ongoing reconstruction of U.S. Route 202 now taking place in the immediate area. Vehicles, not infrequently, are forced to wait for 15 or 20 minutes for one lane of the road to be open. Understandably, some people have chosen to avoid the area entirely. Nevertheless, the roadwork is a *temporary* albeit significant inconvenience, and the end result will be a greatly improved highway.

Still in the opening section of the USPS Final Determination, under the heading "Responsiveness to Community Postal Needs," the Postal Service describes the Route 202 construction project as something that will, as its final result, "remove the access from Route 202 into

Meetinghouse Road restricting access permanently.” This is false. Meeting House Rd.<sup>1</sup> is being reconfigured so that it will intersect 202 slightly north of its present location. This will create a square intersection replacing the sharply angled one now in use. The existing pavement of “old” Meeting House Rd. will remain as access to the post office site and neighboring buildings and property. The “new” Meeting House Rd. bears right, on its approach toward 202, while what will soon be the former approach of Meeting House Rd. to 202 will remain as a driveway or cul-de-sac into the area with the post office. The visibility of the post office – either the existing building, or other structures in the same vicinity that have been proposed during the recent past as possible alternative locations for the Gwynedd Post Office – from Route 202 is unaffected. The way into this area from 202 will be slightly longer but considerably safer. Customers such as myself and other local residents who use Meeting House Rd. to get to the post office would have exactly the same route as before. Appendix B provides a visual schematic or approximate map of the area, along with a discussion of how the road project affects properties near the 202-Meeting House Rd. intersection.

The Final Determination text then goes on to list residents’ concerns, presumably in descending order of importance, about the closure of Gwynedd Post Office. These concerns are: (1) senior citizens; (2) having to travel to another post office for service; (3) inconvenient access at Spring House; (4) the parking situation at Spring House; (5) the need for a change of address on bank checks and stationery; (6) the need for a change of address; (7) the singling out of Gwynedd for discontinuance; (8) how to request a refund of the box rent fee.

How the Postal Service generated this list of concerns, in this particular order, is unclear because they have not released any detailed record recounting the March 3 public meeting from their perspective. As petitioner’s June 6 affidavit states (text in Appendix A), the USPS personnel who

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<sup>1</sup> I have always spelled the name of the street I live on as two words, while the Postal Service documentation uses one word. Both versions are in common use.



conducted the meeting consistently refused to respond to requests for notes their representative took throughout the meeting. Other community members who contacted this same USPS customer service representative expressing various concerns about the closure by phone, e-mail or letter likewise and without exception received no response, to the best of petitioner's knowledge.

Petitioner's own recollection of concerns voiced by community residents at the March 3 meeting is that the less than desirable access and parking conditions at the Spring House site, rated as concerns #3 and #4, probably ranked at the top in terms of generating the most discussion and acrimony. Nothing in the Final Determination text addresses the problem of a harrowing left turn onto Bethlehem Pike, and the response to parking concerns that one can park in either the front or the back is not especially reassuring in light of the fact that the rear parking area is an offloading site for large trucks making deliveries to stores in the shopping center. Admittedly, the lobby of the Spring House Post Office is (for now) open 24 hours, and retail service is available morning and afternoon five days a week. But the Gwynedd Post Office also had reasonably convenient service hours until USPS cut them back.

The top concern is stated to be senior citizens. The population of Foulkeways, a large and thriving retirement community, makes up a large contingent of this group. These individuals live very near the Gwynedd Post Office, some have been box holders, and many do not have cars and were in the habit of walking to the post office. Outside of Foulkeways, the demographic of the general area is also relatively mature. While almost everyone knows that stamps can be purchased at supermarkets and other private sector retail establishments, the most elderly cohorts are probably among those least likely to use Internet-based services such as buying postage online. The corollary of this is that older people are probably also relatively likely to stick with traditional methods of bill paying, etc. using First Class U.S. Mail. Petitioner would concur with the Postal Service that closing the Gwynedd Post

Office does pose a significant concern for senior citizens, and add that the Postal Service stands to lose patronage from a loyal customer base in the process. Package delivery to and from Foulkeways seems most at risk, in effect being ceded to UPS and FedEx. Foulkeways residents, even the majority who were not box holders at the Gwynedd Post Office, heavily depended on it for sending and receiving packages, in addition to using the post office for routine stamp purchases.

On the checklist of concerns in the USPS Final Determination, those having to do with the need to reprint checks with a new address, go to a different post office, and set up a street address were extremely minor issues at the March 3 public meeting. Compared to other matters discussed, the time devoted to these concerns was minimal and the passion aroused by them negligible during a session full of passionate intensity. Using a precise street address has been mandatory ever since the 911 emergency call system was set up.

Concern #7 of the eight cited in the USPS Final Determination points to the process of and grounds for singling out the Gwynedd location for closure. The text reads, “Customers asked why their post office was being reviewed for discontinuation while others were not.” The explanation given is that potential closures are reviewed on “a case-by-case basis.” Apparently, USPS has decided it shall continue to provide this customer base service that it deems to be roughly equivalent to what it previously offered at Gwynedd “by alternate means.”

Petitioner in this brief and the attached appendices points to the different characteristics and locations of the Gwynedd and Spring House branches, and leaves the Commission as it examines this matter to determine how equivalent, for box holders, service at Spring House will be to the service heretofore offered at Gwynedd. Much of the text of the Final Determination suggests that erecting a streetside home mailbox will be the option many Gwynedd box holders resort to. A trend in this direction has already become apparent. Home delivery of mail is convenient, although numerous

households in the area remained post office box holders at Gwynedd for decades. In some cases, this was for practical reasons such as running a small home-based business; sending and receiving inventory may actually be handled more conveniently using a post office box, and the fact that the box holder's physical location would not become widely known arguably provides a certain measure of security. In numerous other cases, box holders remained box holders out of custom or familiarity. Even if it is not the most practical thing to do, checking in at the local post office can be part of a pleasant daily or near-daily routine. Petitioner respectfully requests the Commission to attach some value to the relatively intangible factor of a sense of community, which elimination of the Gwynedd Post Office will damage.

As laid out in Appendix B, Gwynedd became a post office district in 1810 and was one of the first 35 post offices in the entire state of Pennsylvania. The community is far older still, dating to the late 1600s. Although Gwynedd's post office was made a branch subsidiary to the North Wales Post Office at some point in the past, and suburbanization throughout the area is blurring the distinctiveness of individual localities, the community here retains a strong identity. People who live here say their home is Gwynedd, not North Wales, Ambler or Spring House.

Moreover, Gwynedd is a "prestige" location as indicated by survey and tax base data appearing in the business press. Shopping centers and housing subdivisions in adjacent Montgomery Township have names with Gwynedd in them (dubious accuracy notwithstanding) for the perceived cachet; the reverse would not occur. Petitioner indulges this slight digression to make the point that a well-run Gwynedd Post Office with U.S. Route 202 access in the aftermath of that highway's major upgrade would probably enjoy good demand for its boxes, especially since the increasingly constricted employment market will likely propel ongoing small-scale entrepreneurialism of the sort associated with rising utilization of post office boxes for business purposes.

In returning to the issue of USPS singling out the Gwynedd Post Office for closure, petitioner here expresses what she considers the most important argument in this brief, namely that the Postal Service failed to demonstrate that this post office or branch is not economically viable. On the contrary, a strong claim can be made that closing the Gwynedd Post Office would lead to the loss of USPS business volume being even steeper than it would be otherwise.

Note the difference between static and dynamic analysis. On a static basis, the Postal Service holds conjectured revenue constant and subtracts costs it will no longer incur when a targeted facility closes. In fact, the “Economic Savings” displayed on page 4 of the Final Determination text on the Gwynedd Post Office closing is absolutely static analysis. It is entirely labor costs, adjusted by \$2,000 said to represent cost of replacement service. The latter figure may estimate loss of box rent, extra carrier time for home delivery, or both, but it is no more than a guess. Observe, also, that the total annual savings claimed by USPS from closing its Gwynedd location now stands at slightly over \$34,000, versus a \$50,000 figure cited at the March 3 public meeting.

Not that the lower figure is believable, either: the Final Determination baldly states that Gwynedd Post Office personnel will be transferred to the North Wales Post Office. If this is correct, the Postal Service would still owe their salary.

Economists use a concept called opportunity cost. It basically tries to capture benefits from doing something that you don't get if you do something else instead. The crux of the appellant argument is that closing the Gwynedd Post Office carries a high opportunity cost. The decline in revenue recorded in recent years at the Gwynedd Post Office reflects multiple factors: a “secular decline” in mail usage driven by adoption of electronic media for communication, bill paying, etc.; the fact that service hours were slashed to 8-11 a.m. Monday through Friday; and the adverse influence of the Route 202 reconstruction in the immediate area.

Of these three factors, the first one cited, a generalized decline in mail volume, applies to all post offices. To some degree, based on the demographic characteristics of the area, one might even hypothesize that Gwynedd's decline in mail volume somewhat lags the overall observed decline because older people tend to be less avid technology adopters. The second factor, reduced hours, confounds attempts to portray the Gwynedd Post Office as so susceptible to collapsing business volume (due to factors other than shorter hours) that it should close. The last cited factor, the U.S. Route 202 project, has certainly impaired traffic to the post office from that highway. Yet, contrary to statements by the Postal Service, the impairment is temporary, not permanent. Furthermore, despite all these adverse factors which the petitioner acknowledges, *operating cash flow at the Gwynedd Post Office (or branch) has remained positive.*

Maintaining a post office at Gwynedd would secure the only USPS location along a 17.5 mile segment of a major U.S. highway, now undergoing a major upgrade, connecting the county seat cities of Norristown (Montgomery County) and Doylestown (Bucks County). Petitioner contends that permanently shuttering the Gwynedd Post Office would deprive USPS of a better opportunity to register transactions from non-residents as well as locals than is available at any other location in the general area. All other USPS facilities in this vicinity are on secondary roads with strictly local traffic. Although, as a resident of Gwynedd, petitioner is chagrined at the prospect of losing a familiar community institution, the hope for this appeal rests not on a sentimental attachment of this sort, but on the sound business sense of *not* singling out Gwynedd for closure in a clear-headed comparison of what various USPS locations have to offer. In the cost-cutting strategy embraced by the Postal Service, a region-wide pruning of post offices is slated to take place, and in order to execute this maneuver to best effect, USPS should presumably be evaluating the entire set of post offices in the

greater Philadelphia metropolitan area to identify the weakest links. Petitioner is confident that the Gwynedd branch is not one of them.

The Postal Service also argues that the Gwynedd area has a high density of post offices or branches, which is true. This configuration is a historical artifact of the area being one of the earliest focuses of settlement on the Eastern Seaboard, starting centuries ago. Petitioner will only interpose that the nearby area, despite its comparatively high density of post offices, has also already sustained a number of post office closures (Penllyn, Maple Glen, Neshaminy). It is petitioner's hope and intent to avoid a zero-sum game driven by the argument, "Don't close my post office, close somebody else's." While some post office closures are probably necessary, petitioner suspects that the Postal Service is exaggerating the savings to be plucked from its cost-cutting strategy. Be that as it may, petitioner concludes the main argument of this appeal by vouching, insofar as possible, for the economic viability of the Gwynedd site. I humbly request that the Postal Regulatory Commission review the case for closure of the Gwynedd Post Office as put forward by USPS in light of the facts and interpretations presented in this brief.

Dated this 7th day of June 2011.

Respectfully submitted,

CHRISTINA SUROWIEC, PETITIONER

## Closing Comments

The PRC document released May 2, 2011 entitled USPS Customer Service Standardization/Comments of the United States Postal Regulatory Commission on Proposed Amendments to Post Office Consolidation and Closing Processes seems tailor-made for this case. Affected residents received cursory notice of the proposed closure, no notice of appeal rights, and the only ones notified were box holders. Both residents on local carrier routes and existing customers at the Spring House Post Office should have been included in the process, as well – the former surely used the Gwynedd Post Office at times for retail transactions, and in all likelihood some of the latter already found parking and access conditions at the Spring House facility dismaying without the influx of quite a large contingent of new customers.

USPS employed shifting arguments for closure: first that U.S. Route 202 and the Gwynedd Post Office would forever be cut off from each other, then that declining business volume necessitated closure, and finally (on the day the post office actually closed) that the lease was terminated. Petitioner regrets that she did not grasp that immediately filing an Application for Suspension Pending Review, a means or at least a chance to keep the post office open during the appeal process, was equal in importance to initiating the appeal itself. Unfortunately, arguing to reopen a closed post office is a weaker position to be in than arguing to keep a post office open and reverse its scheduled closure. Petitioner earnestly hopes this factor, stemming from procedural ignorance, does not unfavorably prejudice the case too much. Better notification of the right to appeal and more detailed guidance for a layperson undertaking a highly legalistic venture could have brought about a different outcome. In other respects, however – aside from late filing and denial of the Application for Suspension Pending Review – petitioner feels she has managed to uncover numerous weakness in the Postal Service's proffered justification for eliminating the Gwynedd Post Office (or branch).

The role of Foulkeways, which owns the land where the Gwynedd Post Office is situated and which has leased the building to USPS since it was constructed in 1967, is murky. Foulkeways is also landlord or proprietor for the North Penn Fire Co. substation, Beaumont House, and the so-called carriage house. The latter two structures were previously proposed and to some degree approved as alternative sites for the Gwynedd Post Office at a time, as petitioner understands the situation, when upcoming reconfiguration of Route 202 was thought to threaten the post office. Appendix C provides a timeline and some interpolated comments on Foulkeways and Lower Gwynedd Township local government business insofar as information is publicly available. Neither the township nor Foulkeways administration has been forthcoming in response to petitioner's preliminary queries about relevant issues pertaining to the post office. Faced with their silence and non-involvement, petitioner decided to forge ahead on her own with the appeal. The timeline in Appendix C is analogous to a "connect the dots" puzzle in which only some of the dots are present.

One fact is that the post office building had been leased into 2013. If the PRC finds merit in this appeal, petitioner would hope that the Gwynedd Post Office could reopen in its existing site for this interim period. This would allow breathing room to formulate an equitable solution for all parties concerned. Ultimately, if the fire company substation is relocated – the case to do this is reasonably compelling, in contrast to very weak arguments by the Postal Service that this location is no longer suitable for a post office – the space now occupied by the fire trucks and small fire company administrative section could potentially accommodate a post office.



Citation of Authority

39 CFR Part 241: Post Office Organization and Administration – Establishment

Classification and Discontinuance

§241.1 Post Offices

§241.2 Stations and Branches

§241.3 Discontinuance of Post Offices

§241.4 Expansion, Relocation and Construction of Post Offices

39 U.S.C. §404 Postal Service – Specific Powers

[advisory] USPS Customer Service Standardization/Comments of the United States Postal  
Regulatory Commission on Proposed Amendments to Post Office Consolidation and Closing  
Processes, issued May 2, 2011

## APPENDIX A

Copy of affidavit signed & notarized  
June 6, 2011 – actual affidavit  
mailed to the PRC

### Affidavit of Christina Surowiec

My name is Christina Surowiec. I am a freelance writer and consultant, residing at 1333 E. Meeting House Road, P.O. Box 64, Gwynedd PA 19436. As a voluntary project prompted by concerns expressed in my community, I have taken steps to appeal the closing of the Gwynedd Post Office (or branch) by the United States Postal Service to the Postal Regulatory Commission. The PRC has recognized me as lead appellant in this case, to which it has assigned the docket number A2011-15.

In this affidavit, I wish to put on record my best recollection of a public meeting about the Gwynedd Post Office closing, scheduled by Philadelphia-based USPS personnel and held at the Lower Gwynedd Township municipal building on March 3, 2011. The meeting was conducted by a USPS customer service analyst named Mike Roberts, who was accompanied by another USPS customer service person named Donna Saulino. Ms. Saulino took handwritten notes throughout the proceedings. Despite appellant's request, the Postal Service has not provided these notes (or any explanation about what happened to them) to the PRC as part of the appeal documentation.

The meeting drew large attendance, filling the hall. In the hour-plus duration, numerous people who wanted to speak did not get a chance to do so.

Mr. Roberts led off by stating that the Postal Service had to downsize its number of facilities because of an ongoing loss of business volume. No one challenged the fact that postal volume is not what it used to be due to rising use of e-mail and online bill paying, but when Roberts went on to give numerical data on the Gwynedd Post Office's decline in business volume, several attendees shouted back at him that of course there would be a decline in business when the hours were cut in half. In recent years clerk service at the post office has only been available from 8 to 11 a.m. Monday to Friday; both afternoon service and Saturday service were eliminated. Mr. Roberts made no acknowledgement that the reduction in hours would complicate any attempt to analyze the decline in business. Material subsequently submitted by USPS to the PRC does not mention this factor, either. A few attendees also voiced other complaints about the service they received at Gwynedd: finding the counter closed a little *before* eleven, potholes in the parking lot are ones that I recall.

Several people queried Roberts to the effect of "What about the old house? I thought the post office was going to be moved into the old house." His reply (again, I can't quote exactly from memory, but I vividly recall the import of his words) was, "I don't know anything about an old house."

This phase of the discussion dealt with a structure known as the Beaumont House, built in the early 1800s and now owned by the Foulkeways retirement community. In a spectacular though slow-motion event in 2006, a remarkable professional crew from Wolfe House & Building Movers, after detaching the Beaumont House from its original foundation, transported it some hundreds of feet at a rate of several inches a minute to get it out of the way of the Route 202 project. The moving of the house was covered by local TV news and KYW news radio, and an article in the *Lansdale Reporter*

newspaper noted that upcoming restoration of the house would convert the upper floors to guest lodgings for people visiting Foulkeways residents, while the ground floor would become the new Gwynedd Post Office. No public retraction of this plan or proposal ever appeared in the news media, although a careful perusal of minutes for Lower Gwynedd Township local government meetings (something I've only had a chance to do myself over the last two or three weeks as I write this) would reveal changing and still not totally clear plans. At one time years ago, I had the impression that the Route 202 reconfiguration would run right through the existing Gwynedd Post Office, but by early 2011 one could see the actual location of the new roadway, which leaves the post office building intact while shifting the Meeting House Rd.-202 intersection from just south of the Beaumont House parcel to just north of it.

Here I interpolate my surmise, dating back to well before the March 3 public meeting, that plans for the post office had evidently changed and did not involve the Beaumont House. Still, up until the announcement by USPS on February 15, 2011 of its intent, or proposal, to close its Gwynedd location, I had no reason to expect that ongoing activity in the area would lead not to the retention or nearby relocation of the post office, but its elimination. The short hours, the unmaintained parking lot seemed like a temporary inconvenience related to the road work.

At a point relatively early in the meeting at the township building, A.J. Jones, president of the Eastern Montgomery County local of the postal workers' union, introduced himself and gave his perspective on the matter. On the morning of February 16, he said – just as Gwynedd box holders were receiving notice of a **possible** closure of their post office, subject to public input and due consideration of all relevant factors – his maintenance supervisor got word from District Manager Gallagher that Gwynedd **would** close; the purpose of the communication was to get a go-ahead from the union on the Postal Service contracting out the job of dismantling the boxes, etc.

Much of the meeting was animated and contentious. The above-mentioned remarks by Mr. Jones reinforced the impression of the closure being a predetermined inside job. An aide for Congresswoman Schwartz was almost shouted down for making statements that seemed more sympathetic to USPS than residents, although she finished by affirming that the congresswoman opposed the closure and would make some type of attempt to stop it. My father, Frank Surowiec, who had turned 90 one week before, asked Mr. Roberts what the financial savings from closing the Gwynedd Post Office would amount to; the response was “about \$50,000.” As Mr. Roberts further stipulated that there would be no layoffs, much discussion ensued as to how these numbers could ever add up, since operating cash flow at the Gwynedd Post Office was actually positive exclusive of labor costs.

A big bone of contention, discussed for much of the meeting, was USPS' designation of its Spring House branch as the facility that would absorb Gwynedd customers. Gwynedd is a freestanding traditional small post office, Spring House is a unit in a strip shopping center. When someone asked Mr. Roberts for information about terms of the lease at Spring House, he said he didn't know. The top objection residents had, especially those who were box holders at Gwynedd, to being shunted to the Spring House facility was a congested small parking lot and, above all, a hazardous left turn onto Bethlehem Pike, a busy surface road, required to leave the shopping center and head in the direction of Gwynedd. Mark Gray, a Lower Gwynedd Township supervisor, was quoted in the local newspaper story reporting the meeting as saying, “Trying to make a left-hand turn out of that parking lot is a real challenge. You might be solving one problem, but it could be causing another problem.” A less tactful description by another attendee was that the lot at Spring House is a “death trap.” (The Web link to the *Lansdale Reporter* story on the March 3 meeting with the quotes in this paragraph is

<http://www.thereporteronline.com/articles/2011/03/14/news/doc4d7dab3277db1002880255.txt?viewmode=fullstory>). Amid much back and forth, Mr. Roberts never acknowledged this potential hazard.

Elderly residents, some from Foulkeways and others from elsewhere in the area, complained about losing a convenient facility without a viable replacement. Walking to the Gwynedd Post Office from Foulkeways is easy and pleasant for those living there who may no longer drive; walking to Spring House would be impossible. Of the Gwynedd, Spring House and North Wales post offices, Gwynedd in its pre-closure configuration is the only one with a “drive-by” box in which to place outgoing mail from one’s car, a consideration that could be important for frail or disabled people. Another resident made the point that on average those in this area pay high federal, state and local taxes and should receive commensurately good public services, including postal service. While Mr. Roberts noted that box holders did not have to accept the default migration to Spring House and had the option of setting up home delivery, community members gave reasons for preferring boxes: one lived where there was no practical place to put a home mailbox that would be accessible for both her and the carrier; another had a small business that basically required a post office box to operate. Numerous households have had a box at the Gwynedd Post Office for decades. Disruption of long-term continuity understandably provokes resentment. But as I see it, the Postal Service brushed aside without any adequate response objections to its procedural shortcuts, to the practical and financial grounds cited for the closure, and to problems at the Spring House site, and this served to magnify the sense of resentment substantially.

In this statement, I have attempted to relate, according to my best recollection, some of the outstanding particulars of the March 3, 2011 public meeting at the Lower Gwynedd Township municipal building, held by USPS ostensibly to receive community input regarding the closure of the Gwynedd Post Office. In characterizing remarks made by other members of the community, I merely represent the views voiced as I remember them. I am not advocating for any position other than that stated in the arguments of my appellant brief to the PRC.

I declare that, to the best of my knowledge and belief, the information herein is true, correct and complete.

\_\_\_\_\_  
Christina Surowiec

STATE OF PENNSYLVANIA, COUNTY OF MONTGOMERY, ss:

\_\_\_\_\_  
Notary Public

\_\_\_\_\_  
Title (and rank)

My commission expires \_\_\_\_\_

## APPENDIX B

The map constructed by petitioner shows the road configuration in relation to existing structures, including the Gwynedd Post Office, North Penn Fire Co. substation, the Beaumont House (relocated from the enlarged roadway and road frontage being created by the reconstruction of U.S. Route 202), and a smaller historic structure known as the “carriage house” near the relocated Beaumont House.

USPS in its notice to customers about its proposed closure of Gwynedd Post Office and subsequent announcement of the closure stated that the Route 202 project would cut off access by closing Meeting House Rd. The map shows that Meeting House Rd. is being rerouted to the north of the Beaumont House, creating a square, safer intersection with the highway. When the roadwork is complete, the post office and nearby properties will still be visible from Route 202, and still accessible from 202 by a slightly longer but much safer approach. A customer traveling to the post office by Meeting House Rd. would go the same way as ever, the only difference being that the pavement of the original Meeting House Rd., beyond the point where the reconfigured Meeting House Rd. bears right to meet Route 202, would be a driveway or cul-de-sac.

At various times since 2005-2006, proposals discussed at Lower Gwynedd Township local government meetings and occasionally reported in local news media indicated that the Gwynedd Post Office would move to either the Beaumont House or the carriage house. Some sort of upgrade or enlargement of Route 202 has been under discussion, and in fragments acted upon, for many decades – transportation planners first brought up this issue in 1968,<sup>1</sup> ironically one year after the current Gwynedd Post Office building opened, replacing a much smaller wooden building. Several years ago, when detailed planning for the present road project was getting underway, the possibility existed, or at any rate came up in local conversation, that the new road would run right through the post office, necessitating its relocation. As the map shows, this didn’t happen: the way off 202 at the current, soon to be replaced Meeting House Rd. intersection is precisely where Route 202 narrows from four lanes to two lanes – four from this point south, two from this point north. The road reconstruction, represented on the map as an outlined white area next to the solid black stripe that symbolizes Route 202 north of the post office, will make the whole stretch four lanes, but in such a way that the post office structure is unaffected. The Beaumont House, built in 1817,<sup>2</sup> did have to move to avoid being lost to the enlarged highway, a feat accomplished in 2006.

Assertions by the Postal Service that access to Gwynedd Post Office is a problem because the Route 202 project is shifting the Meeting House Rd. intersection seem strained, but the same statement in regard to the North Penn Fire Co. substation that shares a parking lot with the post office would seem to carry more credibility. After all, in responding to an alarm every second counts, and big fire trucks would have to exit their garage bay and negotiate two fairly small roads (though for just a short total distance) to reach the highway, compared to instantaneous highway access under the original road configuration. Although this brief and the attached appendices focus on the status of Gwynedd Post Office, a comparably gnarled record of township government deliberations over the future of the fire substation is available via minutes of Lower Gwynedd Township local government meetings.<sup>3</sup> The cost of a new firehouse or perhaps a combined fire and ambulance company facility is estimated at

\$1.5 million to \$2.5 million. Not long ago, township officials spoke of getting a Homeland Security grant to cover much of this, but in the straitened fiscal circumstances that now prevail, the chances for this have likely grown more doubtful. One thing is certain – a new firehouse, presumably to be sited nearby but with better access to Route 202, won't be built in a day. Until then, the current facility will have to remain in use, and so will the roadway into and out of the parcel on which both the fire station and post office stand.

### *Historical Note*

Gwynedd is an old and historic community, dating to the late 1600s. Its post office district was established in 1810, making it one of the first 35 post offices in the entire state of Pennsylvania.<sup>4</sup> I have not been able to trace when it became a branch of the North Wales post office, and I doubt that the Postal Service can supply an accurate account.

The community's future may be that of an increasingly anonymous though generally affluent suburb. It is mostly "built out," with quite a minor inventory of space available for infill development and the occasional opportunity for redevelopment. Residents are not apt to remember that their jurisdiction was one of the first 35 post offices in the state, that Quakers here admonished each other and their neighbors about the few who kept slaves, that someone cared enough to cobble together a last-ditch appeal trying to save the local post office branch. Mail service will evolve, or devolve, as it will. The local population count is unlikely to change much. Whatever business volume potential the post office has is largely due to the highway, although this potential provides a business asset that the other dozen post offices and branches around here that USPS is retaining for now, along secondary roads with strictly local traffic, don't come close to matching. Then again, the highway – which smacks of circa 1960s expansionist suburbia – takes on a wavery outline rolling into the future. Assurance that it will be a stable replication of what its planners envision may not be all that persuasive to people who are paying attention.

– *Chris Surowiec*

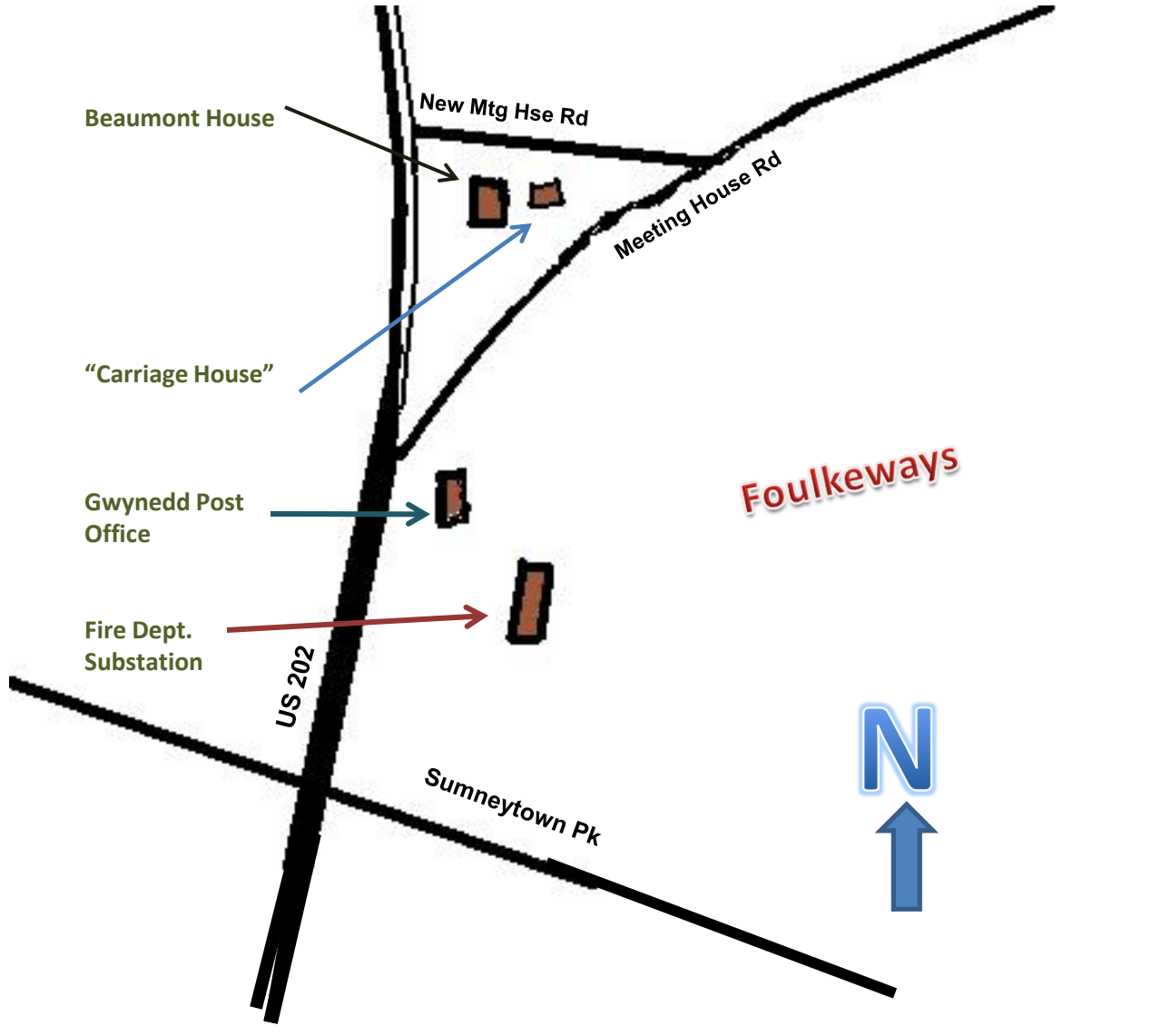
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<sup>1</sup> Livability Initiative: Case Study Highlight: US 202 Parkway, Pennsylvania  
[http://www.fhwa.dot.gov/livability/case\\_studies/guidebook/chap03.cfm](http://www.fhwa.dot.gov/livability/case_studies/guidebook/chap03.cfm)

<sup>2</sup> Gwynedd Friends Meeting history [http://www.gwyneddfriends.org/gwynedd\\_history\\_part2\\_page2.html](http://www.gwyneddfriends.org/gwynedd_history_part2_page2.html)

<sup>3</sup> Lower Gwynedd Township <http://www.lowergwynedd.org/>

<sup>4</sup> Gwynedd Friends Meeting history <http://www.gwyneddfriends.org/gwyneddpostoffice.htm>



## Pictures



Gwynedd Post Office



Carriage House



Beaumont House



Spring House P.O. in Strip Center



## APPENDIX C

For information purposes, this appendix provides a timeline on matters pertaining to the status of the Gwynedd Post Office in recent years. Source is minutes for Lower Gwynedd Township local government meetings unless otherwise specified, with some interpolated comments.

- 2006            Beaumont House moved, preserving it from destruction by the U.S. Route 202 reconfiguration. Local newspaper reports that the ground floor will be the new Gwynedd Post Office.
- Feb. 20, 2007   Lower Gwynedd Township supervisors voted 5-0 to proffer an amended zoning ordinance that would allow a 2-acre lot size as a conditional use for a post office (down from a previously specified 5 acres). Measure meant to accommodate a post office in the Beaumont House.
- March 20, 2007   Public hearing on above ordinance amendments, approved by supervisors on 4-0 vote.
- Nov. 5, 2007    Discussion of upcoming land development matters at the Meeting House Rd.-Route 202 intersection, involving coordination of projects for Foulkeways, the post office, and the fire department substation, in the context of the upcoming 202 road project. Meeting attended by Foulkeways CEO Doug Tweddale. According to the minutes, “Tweddale said the move of the historic Beaumont House and purchase of the Mosig property will provide a post office on campus and a new North Penn firehouse will be built by Lower Gwynedd Township.” Apparently roadwork configuration for the 202 upgrade had already been finalized at this point so that the existing post office building was no longer in the crosshairs. Tweddale said Foulkeways would convert the post office building into residential units. Supervisors voted 5-0 to approve plans for Foulkeways to renovate their dining hall [in the central part of their complex, not near the Meeting House Rd.-202 intersection] and to renovate Beaumont House as previously proposed. This vote did not address any modification of the existing post office.
- May 15, 2008    Lower Gwynedd Township supervisors voted 4-0 to revise a 3-way sewer agreement between Foulkeways, Upper Gwynedd Township and Lower Gwynedd Township. According to the minutes, “Modifications were made to the existing agreement in conjunction with the proposed post office and new buildings.”
- Oct. 14, 2008    Lower Gwynedd Township supervisors voted 5-0 to approve a land development waiver for Foulkeways to build 2 new residential units and expand its maintenance facility. Supervisor Edward Brandt asked Foulkeways CEO Doug Tweddale if Foulkeways was going to dedicate land for the fire station to the township. Site plan [unclear if this is for new units, the fire station, or both] to be presented by Foulkeways later, in conjunction with their request for a building permit.

Aug. 25, 2009 Meeting dealt with a land development application by Foulkeways for the portion of their property adjoining the area of the Route 202 reconfiguration. Zoning Officer Joseph Zadlo said that the plans had changed several times and were ready to be voted on by the township Board of Supervisors. Foulkeways CEO Tweddale said the Beaumont House was moved two years ago [actually it was three years ago]. It will have office space and guest lodgings for people visiting Foulkeways residents. [This marks abandonment of any consideration to relocate the Gwynedd Post Office into the ground floor of the Beaumont House, the plan or proposal that, previously, was quite widely reported. This new application received limited coverage in local newspapers, but not much.]

Tweddale said that the carriage house will be expanded by 600 square feet. **He said that there are rumors that the post office may be closed.** [emphasis inserted] He said that the old post office [i.e., the one in operation until May 27, 2011, the closure of which petitioner is appealing] will be converted to a resident unit with a garage addition. He said the fire station is shown on the new plan. Access to the fire station and storm drainage issues have to be worked out.

Zadlo said that the board could consider approving the plan, subject to eight conditions:

1. Preparation and recording of a façade easement over the front elevation of the existing portion of the Beaumont House.
2. Adjustment of the landscape plan for the purpose of preserving the view of the Beaumont House from Rt. 202.
3. Preparation and recording of a conservation easement over the portion of the property that fronts on Route 202.
4. Documentation of the offer from Foulkeways to donate a site for a new fire/ambulance station with the understanding that Foulkeways will have input into the design of the exterior of building.
5. Approval by the Township of a pedestrian circulation system from the main campus to the Beaumont site including properly designed cross walks.
6. **The only use being approved for the carriage house under this plan is a post office. Conversion of the carriage house to any other use will require land development approval by the Township.** [emphasis added]
7. Review and approval by the Township Engineer for compliance with all the above stated conditions and all Township regulations
8. Execution of a land development agreement, posting of construction escrows and posting of legal and engineering escrows along with the recording of the agreement.

Mr. Tweddale asked if the Township would be flexible if the post office does not move to the site and they have built the additional carriage house. Township Manager Larry Comunale stated the condition that the carriage house will be demolished if the Gwynedd Valley Post Office is closed. [This obviously means the Gwynedd Post Office, not the Gwynedd Valley Post Office.] Foulkeways could return to the Board for any proposed change in use if the Post Office is closed.

The Chairman stated for the record regarding the firehouse and ambulance depot, he hoped that Foulkeways would convey that piece to the Township. Mr. Tweddale stated that would be difficult but Foulkeways could sublease the land with a 99-year renewable lease to the Township. He noted Foulkeways would like a farmhouse exterior and would like the Board's input on the exterior view of the house. The Chairman asked for public comments. There were none. Dr. Booth made a motion, seconded by Mr. Behr to approve the preliminary land development for Foulkeways at DeKalb and Meetinghouse Road (plans dated December 8, 2006, last revised June 22, 2009 with revised Sheet 12 last revised August 14, 2009 ) with the above conditions as outlined by Mr. Zadlo. The motion carried 4 – 0.

The *Ambler Gazette*, a local newspaper, reported these proceedings with some divergences from the township local government meeting minutes displayed above. The article refers to the plan for the carriage house as one that would put in place a new post office for the Foulkeways **campus**. Gwynedd Post Office, of course, is or was a U.S. Post Office branch, not a private facility catering exclusively to Foulkeways residents. The article does state, consistent with the local government minutes, that Foulkeways intended to convert Gwynedd Post Office (described as “the current post office”) into a residential unit. It does not mention the either-or condition in the Foulkeways plan approved by the township for the carriage house to be used as a post office or else demolished. Nor does the article make any mention of Mr. Tweddale's statement, the first reference as far as the petitioner knows to the upcoming demise of Gwynedd Post Office, vaguely alluding to “rumors” that the post office will close. Source for this paragraph: *Ambler Gazette* article published August 28, 2009 headlined “Lower Gwynedd board approves renovations to historical property”; Web link at [http://www.montgomerynews.com/articles/2009/08/26/ambler\\_gazette/news/doc4a94c2f9eacca579103692.txt?viewmode=fullstory](http://www.montgomerynews.com/articles/2009/08/26/ambler_gazette/news/doc4a94c2f9eacca579103692.txt?viewmode=fullstory)