

Attachment "A"



UNITED STATES OF AMERICA
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

RUTH Y. GOLDWAY
CHAIRMAN

June 8, 2011

Postmaster General Patrick Donahoe
United States Postal Service
475 L'Enfant Plaza
Washington, DC 20260

Dear Mr. Donahoe:

During service performance consultations earlier this year, you discussed the internal Postal Service schedule for improving the process of reviewing retail facilities to evaluate whether closing them was appropriate. You explained that new procedures would be developed and then applied to a substantial number of facilities nationwide. You also assured the Commission that should the process indicate that closing a significant number of existing retail outlets appeared justified, the Postal Service would file a request with the Commission for an advisory opinion under 39 U.S.C. 3661 prior to closing those facilities.

Consistent with that schedule the Postal Service published proposed rules in the *Federal Register* on March 31, 2011 (76 FR 17794), and as you may know, the Commission submitted timely comments. During this period, numerous articles have appeared in the press identifying facilities in a number of states that have been closed, or that have been evaluated for potential closing, or shortly will be evaluated for potential closing. The Commission has received an increased number of post office closing appeals, hundreds of inquiries from citizens, and has had communications with concerned members of Congress. Thus, it appears that the Postal Service may already be engaged in a nationwide change in service without prior notification to the Commission as title 39 requires. A prompt request for an advisory opinion on the impacts of closing retail facilities appears to be the best way to address these concerns.

The Commission is fully aware of the current financial circumstances the Postal Service is experiencing, and the Commission will take prompt action on the request for an advisory opinion. The process of filing an advisory opinion gives the public and the Commission the opportunity to consider the comprehensive plans the Postal Service is developing for retail realignment and avoids the confusion that now surrounds post office closings. I am writing to ask your assistance in assuring that the Commission can analyze the Postal Service request quickly and thoroughly for the benefit of all.

Commission rules applicable to such requests are quite general, as the contents of a satisfactory filing necessarily will vary, depending on the subject matter of each request. The rules simply require the submission of information and data sufficient to fully inform the Commission of the impact of the proposed change. See 39 CFR 3001.74. In this regard, it would be extremely helpful if the Postal Service includes with its request a detailed discussion of how the cumulative impact of the local changes involved will affect the fulfillment of national access and delivery aspects of the Postal Service's universal service obligation, and on how the Postal Service balanced the estimated benefits to its financial situation against the potential negative impact on customer convenience. In addition, it seems certain that, among other things, the Commission will require information on:

- Postal operated retail facilities that have ceased providing service since January 1, 2011;
- Postal operated facilities that have been noticed for closure or lease termination and that are still under consideration;
- The postal operated retail facilities for which cessation of service is currently under internal review; and
- A comprehensive state-by-state list of postal operated retail facilities and their locations.

Therefore, I am taking this opportunity to request that you assure that any Postal Service filing in support of such a proposed change include the above information. This will greatly assist the Commission to provide timely input to the Postal Service final decision.

Thank you in advance for your help.

Sincerely,



Ruth Y. Goldway
Chairman