

LIBRARY REFERENCE USPS-LR-N2011-1/1

USPS HANDBOOK PO-101
*POSTAL SERVICE-OPERATED RETAIL FACILITIES
DISCONTINUANCE GUIDE*

RELATING TO THE TESTIMONY OF WITNESS BOLDT (USPS-T-1)

PURPOSE: USPS-LR-N2011-1/1 contains a copy of the July 2011 edition of the USPS Handbook PO-101 *Postal Service-Operated Retail Facilities Discontinuance Guide*, which is associated with the testimony of witness Boldt (USPS-T-1). It is a Category 2 library reference, and is sponsored by witness Boldt.

PREDECESSOR MATERIAL: USPS-LR-N2009-1/3, USPS Handbook PO-101, *Post Office Discontinuance Guide* (August 2004).

CONTENTS: The library reference contains information on policies and procedures affecting investigation of the possible discontinuance of Postal Service-operated retail facilities.

Postal Service-Operated Retail Facilities Discontinuance Guide

Handbook PO-101

July 2011
Transmittal Letter

- A. Introduction.** Handbook PO 101, *Postal Service-Operated Retail Facilities Discontinuance Guide*, serves as a tool for providing district Discontinuance Coordinators information on policies and procedures affecting investigation of the possible discontinuance of Postal Service-operated retail facilities. Through adherence to this handbook, the Postal Service™ will assess the viability of and customer access to retail facilities, ensuring that the Postal Service continues to provide cost effective universal service to all Americans.
- B. Explanation.** This handbook outlines the procedures applicable to the discontinuance process and emphasizes customer participation in such investigations. As a policy decision the Postal Service now extends the notice and comment procedures for Post Office discontinuance investigations to discontinuance of Classified Stations and Classified Branches. The purpose of this handbook is to explain how field personnel may best undertake the investigative process. The changes to this handbook are not retroactive and are not mandatory for discontinuance actions commenced when previous procedures and regulations were in effect and for which the initial feasibility study was begun before the transmittal of this handbook.
- C. Distribution.** Handbook PO-101 is available on the Postal Service Intranet on the PolicyNet Web site:
1. Go to <http://blue.usps.gov/cpim>.
 2. Click on *HBKs*.
- D. Revisions.** We will issue any new or revised policies or procedures through *Postal Bulletin* articles.
- E. Rescissions.** Any previous applicable directive that is in conflict with this handbook is rescinded. The previous issue of Handbook PO-101 is obsolete.
- F. Comments.** Submit comments and questions about the content of this handbook in writing to:
- MANAGER
CUSTOMER SERVICE OPERATIONS
DELIVERY AND POST OFFICE OPERATIONS
US POSTAL SERVICE
475 L'ENFANT PLAZA SW ROOM 6800
WASHINGTON DC 20260-6800

G. Effective Date. This handbook is effective on July 14, 2011.

A handwritten signature in black ink, appearing to read "Dean J. Granholm". The signature is fluid and cursive, with the first name "Dean" being particularly prominent.

*Dean J. Granholm
Vice President
Delivery and Post Office Operations*

Contents

1	Introduction.....	1
11	Overview.....	1
111	Purpose.....	1
112	Scope.....	1
112.1	General.....	1
112.2	References.....	1
12	Federal Law Regarding Post Office Discontinuances.....	1
121	Independent Post Offices.....	1
122	Classified Stations and Branches.....	2
13	Responsibilities.....	3
131	Vice President, Delivery and Post Office Operations.....	3
132	District Manager.....	3
133	District Review Team.....	3
133.1	Designated Team Members.....	3
133.2	Discontinuance Coordinator.....	4
133.3	Discontinuance Feasibility Study Process Flow.....	5
2	Feasibility Study.....	7
21	Decision to Study.....	7
211	Authorization.....	7
212	Circumstances Prompting Decision to Study.....	7
212.1	Postmaster or Other Responsible Personnel Vacancy.....	7
212.2	Emergency Suspension.....	7
212.3	Office Workload.....	8
212.4	Insufficient Customer Demand.....	8
212.5	Reasonable Alternate Access.....	8
212.6	Special Circumstances.....	8
213	Circumstances Insufficient to Justify a Discontinuance Study.....	8
213.1	Building Modifications for the Disabled.....	8
213.2	Restroom Facilities.....	8
213.3	OSHA Requirements.....	8
213.4	Operation of Small Post Office at Deficit.....	8
22	Pre-proposal Investigation.....	9
221	Notifying Customers.....	9
222	Initiating the Study.....	9
223	Conducting an On-site Investigation.....	10

23	Analyzing Service Alternatives	11
231	General	11
232	Types of Alternate Retail Services	11
232.1	Consolidation.	11
232.2	Prohibited Locations	11
232.3	Contractor-Operated Retail Facility.	11
233	Types of Alternate Delivery Services.	12
233.1	Discontinuance	12
233.2	Rural and Contract Delivery Service	12
233.3	Rural Nonpersonnel Unit	12
24	Customer Questionnaires	13
241	Purpose	13
242	Preparing the Questionnaire	13
242.1	Enclosures	13
243	Analyzing Customer Questionnaires	14
244	Management’s Recommendation	14
244.1	District Review	14
244.2	Headquarters Preliminary Review	14
244.3	Justification for Discontinuance	15
244.4	Decision to Post Proposal	15
25	Community Meeting	15
251	General	15
251.1	Selecting Date and Location	15
251.2	Notifying Customers	16
252	Preparing for the Meeting	16
253	Conducting the Meeting	16
254	Analyzing the Meeting.	16
26	Customer Comment Letters	17
261	Centralized Location	17
262	Customer Response Letters	17
263	Excessive Volume of Comments.	17
3	The Proposal.	19
31	General	19
311	Discontinuance Coordinator Responsibilities	19
311.1	Memorandum to the Record	19
311.2	Proposal Checklist.	19
311.3	Log of Post Office Discontinuance Actions.	19
312	Official Record.	20
312.1	Review of Official Record	20
312.2	Copies of Record Documents	20
313	Archiving Official Record.	20
313.1	Preparing to Archive Record	20

Contents

313.2	Archiving Record	20
32	Components of the Proposal	21
321	Description	21
321.1	Responsiveness to Community Postal Needs	21
321.2	Effect on Community	21
321.3	Effect on Employees	21
321.4	Economic Savings	21
321.5	Other Factors	21
321.6	Summary	22
321.7	Notice	22
33	Official Administrative Record	22
331	Description	22
332	Format	23
333	Content	23
334	Availability of Record to Public	23
34	Writing Tips	24
341	Numbers	24
342	Contractions	24
343	Time	24
344	Customer Names	24
35	60-Day Posting Period	25
351	Before Posting	25
351.1	Discontinuance Coordinator Review	25
351.2	Notification to Government Relations and Public Policy	25
352	Posting	25
352.1	General	25
352.2	Letter of Instructions	25
352.3	Invitation for Comments	25
352.4	Comment Forms	26
353	After Posting	26
353.1	Letter of Instructions	26
353.2	Notice of Taking Proposal and Comments Under Internal Consideration	26
353.3	Analysis of Comments	26
353.4	Response to Customer Comments	27
36	Revising Proposal	27
361	Definition	27
362	Components of Revised Proposal	27
362.1	Description	27
362.2	Cover Page	27
362.3	Responsiveness to Community Postal Needs	27
362.4	Effect on Community	27
362.5	Effect on Employees	27
362.6	Economic Savings	27

362.7	Summary	27
362.8	Notice	28
363	60-Day Posting Period	28
363.1	Significant Change	28
4	Final Determination	29
41	District Review	29
411	Official Record.....	29
412	Log of Discontinuance Actions	29
413	Transmittal from Manager, Post Office Operations	29
414	Certification of Record	29
415	Review and Re-evaluation by District Manager	29
415.1	Proposal Not Warranted	30
415.2	Proposal Warranted.....	30
42	Headquarters Review	30
421	General	30
422	Determinations	30
422.1	Returned for Further Action or Information	30
422.2	Proposal Not Warranted	31
422.3	Proposal Warranted.....	31
423	Notification	33
423.1	To Local Officials.....	33
423.2	To Customers	33
5	Appeal Procedures.....	35
51	General.....	35
511	Who May Appeal.....	35
512	Where to Appeal	35
513	When to Appeal.....	35
514	Notification to District Manager	35
515	Appeal Documents	36
52	Discontinuance Pending Appeal.....	36
53	Postal Regulatory Commission Decisions	36
531	Final Determination Affirmed.....	36
532	Final Determination Remanded.....	36
532.1	General	36
532.2	Discontinuance Not Warranted	37
532.3	Returned for Further Consideration.....	37

6	Special Circumstances	39
61	Suspensions	39
611	Definition	39
612	Authority	39
613	Notification	39
613.1	To Headquarters	39
613.2	To Local Officials	39
613.3	To Customers	40
614	Alternate Service	40
615	Employee Reassignment	41
616	Suspension Review Team	41
617	Timing of Suspension and Discontinuance Study	41
618	Plan of Action	42
619	Restoration of Service	42
62	Name Change	42
621	General	42
622	Current Instructions	42
623	Use of Branch or Station Designation	42
63	Merging Facilities	43
631	Definition	43
632	A Hypothetical Situation	43
632.1	Background	43
632.2	Suggested Plan of Action	44
64	ZIP Code Elimination	45
641	General	45
642	Discontinuance	45
642.1	Community Place Name	45
642.2	Request for ZIP Code Elimination	46
642.3	Conversion or Consolidation	46
642.4	Post Office Box Range	46
642.5	Minimizing Address Changes for Customers	46
642.6	Rural and Contract Delivery Route Numbers and Box Ranges	46
642.7	Customer Notification	46
643	Consolidation	47
643.1	Community Place Name and ZIP Code	47
643.2	Customer Notification	47
644	Official Record Documentation	47
644.1	Post Office Discontinuance	47
644.2	Post Office Consolidation	47

7 Best Practices in Discontinuance Process	49
71 Best Practices by Step in the Process	49
711 Suspensions	49
712 Initial Investigation	49
713 Questionnaires	49
714 Community Meetings	50
715 Proposal	50
716 Official Record	51
Appendix A – Glossary of Terms	53
Appendix B – References	57

1 Introduction

11 Overview

111 Purpose

This handbook is designed to assist field personnel in undertaking a feasibility study, an investigation that may lead to the discontinuance of a Postal Service-operated retail facility that could be a Post Office™, Classified Station, or Classified Branch.

112 Scope

112.1 General

These guidelines apply to the Postal Service's consideration of whether an existing USPS-operated Post Office, Classified Station, or Classified Branch should be discontinued. This includes any study, proposal, or final determination to:

- a. Replace a Postal Service-operated retail facility with a contractor-operated retail facility.
- b. Combine one or more Postal Service-operated retail facilities.
- c. Close a Postal Service-operated retail facility without providing a replacement facility.
- d. Convert a Post Office into, or replace a Post Office with, another type of Postal Service-operated retail facility.

112.2 References

See [B](#) for a list of references on the discontinuance process. This list is a guide to further resources.

12 Federal Law Regarding Post Office Discontinuances

121 Independent Post Offices

Under Title 39, *United States Code*, Section 404(d), any decision to close or consolidate a Post Office must be based on certain criteria. These include:

- a. The effect on the community served.
- b. The effect on employees of the Post Office.

- c. Compliance with government policy established by law that the Postal Service™ must provide a maximum degree of effective and regular postal services to rural areas, communities, and small towns where Post Offices are not self-sustaining.
- d. The economic savings to the Postal Service.
- e. Any other factors the Postal Service determines necessary.

By means of a 1998 amendment, the Postal Service may not consider Occupational Safety and Health Administration (OSHA) compliance when deciding whether to close a Post Office. In addition, certain procedures apply to discontinuance actions:

- a. The public must be given notice of the Postal Service's intention to close or consolidate a Post Office at least 60 days prior to the proposed effective date of the closure or consolidation, to enable the persons served by a Post Office to evaluate the proposal and provide comments. As a matter of policy, the Postal Service extends this requirement to discontinuance actions of USPS-operated Classified Stations and Classified Branches.
- b. The final determination to close or consolidate a Post Office must be made in writing and must include findings covering all the required considerations after public comments are received and taken into account. As a matter of policy, the Postal Service extends this requirement to discontinuance actions of USPS-operated Classified Stations and Classified Branches.
- c. The written determination must be made available to the customers served by the office at least 60 days before the discontinuance takes effect. As a matter of policy, the Postal Service extends this requirement to discontinuance actions of USPS-operated Classified Stations and Classified Branches.
- d. Any customer served by an affected Post Office may appeal the decision to the Postal Regulatory Commission (PRC) within the first 30 days after the written determination is made available.
- e. The PRC may either affirm the determination of the Postal Service or return the matter for further consideration, but may not modify the determination.
- f. The PRC is required by title 39, *United States Code*, section 404(d)(5) to resolve the appeal no later than 120 days after receiving the appeal.

122 **Classified Stations and Branches**

As a matter of policy, the Postal Service applies certain provisions of this handbook to discontinuance actions associated with USPS-operated Classified Stations and Classified Branches.

13 Responsibilities

131 **Vice President, Delivery and Post Office Operations**

The Vice President, Delivery and Post Office Operations (or designee), makes final determinations to discontinue independent Post Offices, Classified Stations, and Classified Branches, if recommended by the District Manager. In addition, the Vice President, Delivery and Post Office Operations, may provide authorization to study a retail facility for possible discontinuance.

132 **District Manager**

The District Manager is responsible for overseeing the Post Office discontinuance feasibility studies within a district and provides approval before any such studies are initiated, unless approval has already been furnished by the Vice President, Delivery and Post Office Operations. Upon approval to study a Post Office, Classified Station, or Classified Branch for possible discontinuance, the District Manager may establish a District Review Team.

The District Manager must ensure that the Vice President, Area Operations, is notified of all discontinuance actions involving a Post Office, Classified Station, or Classified Branch.

In addition, the District Manager is responsible for reviewing the results of the feasibility study prior to providing approval/disapproval to post a formal proposal. Finally, the District Manager decides whether to submit a revised proposal, which the District Manager has reviewed for accuracy and completeness, to the Vice President, Delivery and Post Office Operations, for review and final determination.

133 **District Review Team**

If established, the District Review Team usually includes the functional organizations listed in [133.1](#) at the district level. Each of these functional organizations plays a critical role in the discontinuance process. These functional organizations within the district are responsible for the development and coordination of any data collection, communications, analysis, or other action necessary to support a discontinuance study under their functional responsibility.

133.1 **Designated Team Members**

- a. *Facility Service Office*: Facility and lease data.
- b. *Manager, Post Office Operations (MPOO)*: Operational data and impacts.
- c. *Manager, Operations Programs Support*: Delivery data and alternate delivery options, environmental considerations
- d. *Manager, Finance*: Development and coordination of financial data.
- e. *Postmaster (for discontinuance of Post Offices, Classified Stations, or Classified Branches)*: Local knowledge.

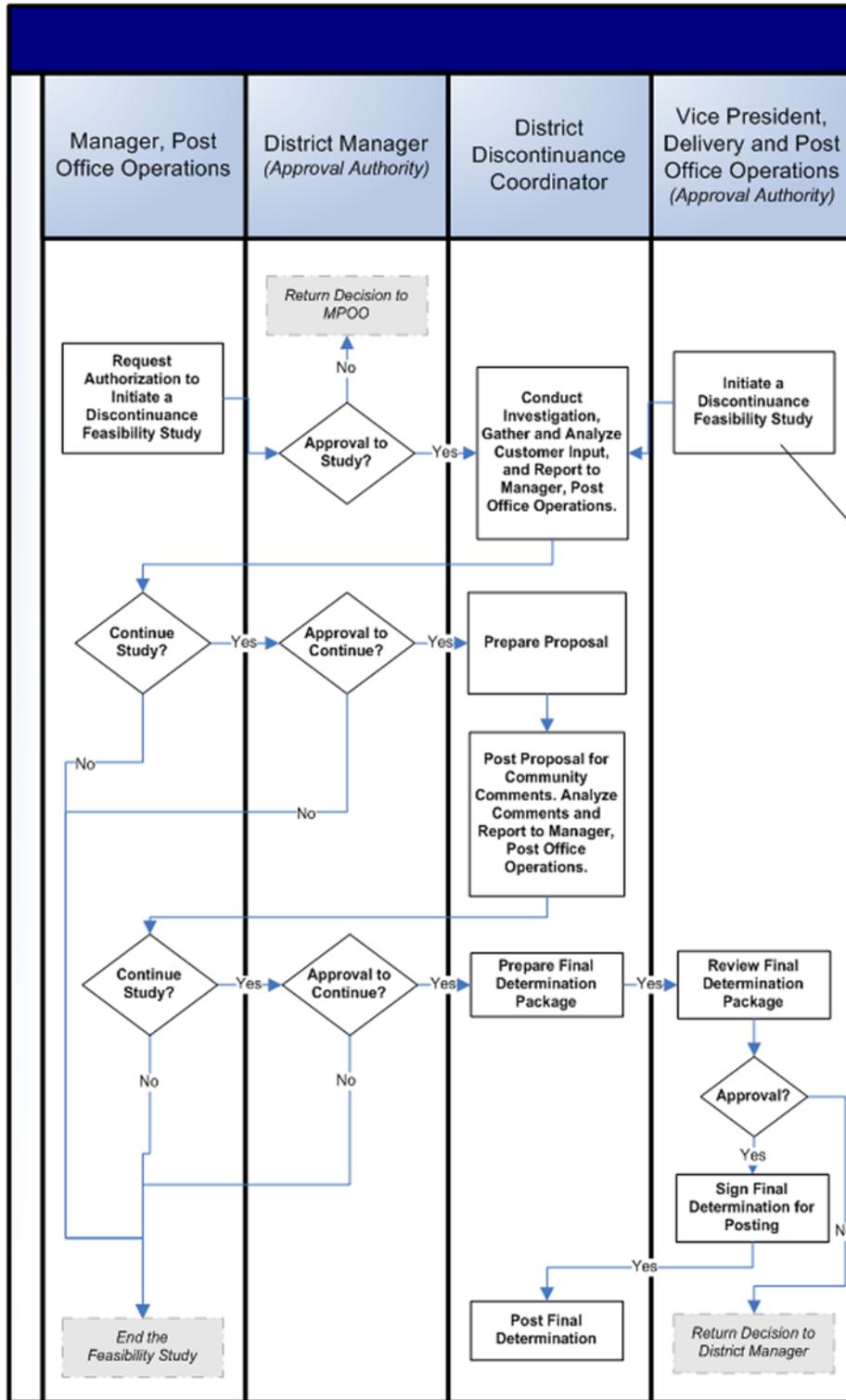
- f. *Discontinuance Coordinator:* Assistance and support to the District Review Team throughout the discontinuance process. The Discontinuance Coordinator is responsible for thoroughly reviewing official records and certifying their accuracy and compliance with federal law, Postal Service policy, and the instructions in this handbook.
- g. *Manager, Marketing:* Customer data and coordination of community meetings, retail and alternate access, permit mailers and data related to permit mailing options; coordination of and response to all customer inquiries and concerns.
- h. *Corporate Communications:* Communication to media and employees.
- i. *Human Resources:* Labor issues and communications to employee and management organizations.
- j. *Government Relations at Postal Headquarters and District Congressional liaison contact:* Congressional, state, and local government involvement.

133.2 **Discontinuance Coordinator**

Discontinuance Coordinator has administrative and coordination responsibilities for the discontinuance activities, including:

- a. Coordinating and analyzing data collected to investigate possible discontinuance with appropriate district stakeholders.
- b. Making recommendations to the District Manager based on analytical results.
- c. Compiling the official record of documentation.
- d. Ensuring that the discontinuance investigation complies with federal law, Postal Service policy, and the instructions set forth in this handbook.
- e. Ensuring process steps are completed in a timely manner.
- f. Conducting environmental reviews.

133.3 Discontinuance Feasibility Study Process Flow



A Discontinuance Feasibility Study may be initiated by the VP, Delivery & Post Office Operations or by the District Manager, Post Office Operations with District Manager approval.

2 Feasibility Study

21 Decision to Study

211 **Authorization**

The first step in investigating possible discontinuance is an official decision to undertake a study. No feasibility study may begin without authorization by the District Manager or the Vice President, Delivery and Post Office Operations. The authorization must be documented and included in the official record.

Begin compilation of the official record as soon as a decision is made to initiate a discontinuance study.

212 **Circumstances Prompting Decision to Study**

212.1 **Postmaster or Other Responsible Personnel Vacancy**

A vacancy in the position of postmaster or that of other responsible personnel may lead to a decision to conduct a study.

212.2 **Emergency Suspension**

The cancellation of a lease or rental agreement when no suitable alternate quarters are available in the community, a fire or natural disaster, irreparable damage when no suitable alternate quarters are available in the community, a challenge to the sanctity of the mail, or similar reasons may lead to a decision to study (see 611).

212.21 **Study Based on Emergency Suspension: Timing**

Wherever possible, when an initial feasibility study is to be initiated due to an emergency suspension, initiate the discontinuance process sufficiently in advance of the circumstance prompting the emergency suspension (for example, anticipated cancellation of a lease or rental agreement) to allow a meaningful opportunity for public input to be taken into account before services are suspended. If necessary to continue gathering information, local management should also, to the extent possible, seek to continue operations as long as necessary to reach an outcome in the discontinuance process. In situations where the circumstances prompting an emergency suspension are not known in advance of the emergency suspension, a decision should be made within 90 days of an emergency suspension to secure alternate quarters, take necessary corrective action, or initiate a feasibility study.

212.3 Office Workload

Earned workload below the minimum established level for the lowest non-bargaining Executive and Administrative Schedule (EAS) employee grade may lead to a decision to study.

212.4 Insufficient Customer Demand

Insufficient customer demand, evidenced by declining or low volume, revenue, revenue units, local business activity, or local population trends, may lead to a decision to study.

212.5 Reasonable Alternate Access

The availability of reasonable alternate access to postal services for local customers may lead to a decision to study.

212.6 Special Circumstances

Special circumstances — such as the incorporation of two communities into one — may also warrant a decision to study. See chapter [6](#) or contact the Headquarters Review Coordinator for assistance.

213 Circumstances Insufficient to Justify a Discontinuance Study

The following circumstances cannot be used to justify initiation of a discontinuance study.

213.1 Building Modifications for the Disabled

Any claim that the continued operation of a building without modification that facilitates access by disabled persons warrants discontinuance is inconsistent with the Architectural Barriers Act (42 USC 4151 et seq.) and serves only to show that necessary modifications must be made that satisfy those requirements, or that a waiver must be received. As such, any claim of noncompliance does not, in and of itself, constitute justification to discontinue a retail facility.

213.2 Restroom Facilities

The absence of running water or restroom facilities may be considered in conjunction with other factors in the feasibility study. However, the absence of such facilities does not, in and of itself, constitute justification to discontinue a retail facility.

213.3 OSHA Requirements

The Postal Service may not consider compliance with Occupational Safety and Health Act of 1970 (29 USC 651 et seq.) in making a discontinuance determination.

213.4 Operation of Small Post Office at Deficit

The Postal Service is precluded as a matter of law from discontinuing a small Post Office solely for operating at a deficit. The operation of a small Post Office at a deficit cannot be used to justify initiation of a discontinuance study unless other permissible circumstances under [212](#) are present.

22 Pre-proposal Investigation

221 **Notifying Customers**

After the authorization to study is approved by the District Manager or the Vice President, Delivery and Post Office Operations, responsible field personnel begin to distribute initial communications to employees, customers, and other stakeholders.

222 **Initiating the Study**

Responsible field personnel begin preparations for a feasibility study upon receiving authorization from the Vice President, Delivery and Post Office Operations, or from the District Manager. The Discontinuance Coordinator should coordinate the following activities:

- a. The Manager, Consumer and Industry Contact (District), confirms the PO Box™ address at which the district receives customer questionnaire responses, written comments and other customer or stakeholder input.
- b. The Discontinuance Coordinator obtains a list of affected delivery addresses for the studied retail facility from the district Address Management System manager. The Discontinuance Coordinator also prepares customer notifications to each affected delivery customer (as outlined in subchapter [24](#)).
- c. The Facilities Service Office provides current lease information, copies of recent building inspections, the facility call history, and any request to locate alternate quarters, as applicable.
- d. The Postal Inspection Service provides the listing of vandalism cases reported by the IS and local law enforcement.
- e. The Manager, Finance, coordinates the collection of financial data.
- f. The Manager, Post Office Operations (MPOO), has responsibility for the completion of PS Form 4920, *Discontinuance Feasibility Study Survey*, and PS Form 150, *Postmaster Workload Information, or Station Manager WSC*. The MPOO is responsible for obtaining records of PS Form 25, *Trust Fund Account*, and PS Form 3609, *Record of Permit Imprint Mailings*, if applicable. The MPOO also has responsibility for determining the employee impact.
- g. The district Bulk Mail Entry Unit (BMEU) provides a listing of permit mailers from the *PostalOne!* system. Additionally, the district BMEU should identify any drop shipment customers that may be affected by discontinuance.
- h. The Manager, Operations Programs Support (MOPS), provides delivery growth rates and begins investigating alternate delivery options, in accordance with procedures established by Headquarters.
- i. The Manager, Marketing, provides a map of the area showing the proximity of the installation under study to other installations and to alternate access points. The Manager, Marketing, also begins

investigating alternative retail options, in accordance with procedures established by Headquarters.

223 **Conducting an On-site Investigation**

The following should be performed by the Discontinuance Coordinator or by local employees acting under the direction of the Discontinuance Coordinator:

- a. Using a digital camera, photograph the interior and exterior of the retail facility. Photograph any structural defects, safety hazards, and security deficiencies. Take careful notes on the condition of the building. If there are defects and a current inspection is not received from the Facilities Service Office (FSO), request a building inspection from the FSO. Take or download photographs of the community, such as views of the community facing north, south, east, and west of the installation. Photograph or download digital photographs of any potential alternate quarters, potential contractor sites, or nonpersonnel unit sites.
- b. Explain discontinuance regulations to the Postmaster, OIC, or other staff responsible for the affected retail facility. Explain the discontinuance process and how to handle customer inquiries. Make it clear that no final decision has been made at this point in the investigation.
- c. Contact or visit retail establishments to determine whether potential interest exists for a contractor-operated retail facility (see [232.3](#)).
- d. Inspect and review any potential environment considerations at the facility. These considerations should include those conditions currently existing:
 - (1) *Environmental equipment or systems* — determine if the facility has aboveground or underground storage tanks, paint booths, oil/water separators, acid neutralization pits or any other such equipment that has potential environmental aspects. Such equipment may require proper environmental decommissioning. We cannot simply walk away, abandon or temporarily lock-out such equipment or systems.
 - (2) *Environmental permits and registrations* — determine if the facility has any storage tank permits or registrations, air permits; hazmat generator permits, storm water permits, etc. These may also need to be formally closed out with the appropriate regulatory agencies.
 - (3) *Environmental records* — certain environmental records need to be properly managed and should not be discarded. Examples include asbestos records; environmental sampling data; tank closure information, tank tightness tests, or environmental monitoring results.
 - (4) *Hazardous material (hazmat) or hazmat equipment* — typical hazmats may include parts or brake cleaners, paints, lacquers, finishes, oils, solvents, gas containers, and certain household

cleaners. Stored (not in use) fluorescent bulbs and ballasts may also need special handling.

- e. Complete a checklist or memorandum to the file documenting potential future impacts to the environment or unusual circumstances for actions that are categorically excluded. Most post office actions can be categorically excluded under:
 - (1) Postal facility function changes not involving construction, where there are no substantial relocation of employees, or no substantial increase in the number of motor vehicles at a facility
 - (2) Closure or consolidation of post offices under 39 USC 404.

Contact the Sustainability Office if environmental considerations exist at the facility or if further technical guidance and instructions are needed.

23 Analyzing Service Alternatives

231 **General**

Rank possible replacement services in order of practicality, costs, and the need to maintain effective and regular service to the community. In some cases, a combination of services may prove beneficial to customers and the Postal Service. A closure or consolidation may affect the PO Box fees for customers. If so, include such information in any subsequent proposal. See *Mailing Standards of the United States Postal Service, Domestic Mail Manual (DMM[®])* and Notice 123, *Price List*, for information on PO Box fees. *It is imperative that effective, regular service be maintained, since the law requires the maintenance of a maximum degree of regular and effective service to rural areas.* If an office undergoes an emergency suspension, the temporary alternate service should be that most likely to become the permanent alternate service.

232 **Types of Alternate Retail Services**

232.1 **Consolidation**

A consolidation arises when (a) a Postal Service-operated retail facility is replaced with a contractor-operated retail facility or (b) an independent Post Office is replaced with a classified station or classified branch that reports to an administrative Post Office.

232.2 **Prohibited Locations**

Contractor-operated retail facilities may not be located in or directly connected to a room in which intoxicating beverages are sold for consumption on the premises.

232.3 **Contractor-Operated Retail Facility**

Visit potential sites to elicit interest among qualified offerors for a contractor-operated retail facility. A contractor-operated retail facility is usually located in an established business, such as a grocery store, and often adds to the financial base of the community. Many types of postal services can be

provided through contractor-operated facilities. Permit mailings cannot be entered via contractor-operated facilities. Non-postal services may be made available at a contractor-operated retail facility. Hours of operation often exceed those in a Postal Service-operated retail facility. Before proposing a contractor-operated retail facility, be sure of interested offerors and that a reasonable offer can be expected. The economy of the area must be considered in determining a reasonable bid. When establishing a contractor-operated retail facility, refer to the Denver Category Management Center (CMC).

233 **Types of Alternate Delivery Services**

233.1 **Discontinuance**

A discontinuance involves ending operations at an independent Post Office, Classified Station, or Classified Branch. Normally, the ZIP Code™ for each address served by a discontinued retail facility is retained. A discontinuance does not require a change in ZIP Code unless ZIP Code elimination is approved by the Vice President, Area Operations. Do not make a request for ZIP Code elimination unless needed for logistics to provide efficient mail service. Resolve whether a ZIP Code will be eliminated before telling customers that their ZIP Code will change and before beginning the 60-day proposal posting period.

233.2 **Rural and Contract Delivery Service**

For rural and contract delivery service, evaluate the route workload and determine: (a) whether any change in evaluation or overburden will exist; (b) optimum mode of delivery, whether to roadside mailboxes, cluster box units (CBUs), or both; and (c) whether mail theft or vandalism issues exist on the route. Customer addresses may change; however, the community name and ZIP Code are ordinarily retained in the address. Customers can obtain retail services only through a rural or contract delivery service carrier.

233.3 **Rural Nonpersonnel Unit**

In a nonpersonnel unit, the Postal Service leases space, offers retail services each delivery day, and may deliver to CBUs or PO Boxes. The carrier brings mail to the office, distributes mail into delivery receptacles, and provides retail services for a specified time. Retail services are available a minimum of 15 minutes each delivery day. The nonpersonnel unit provides a centralized location for customers to meet and allows the community to retain a retail outlet. Address changes are ordinarily not required. If space is leased in another business or in the community, this may provide customers with improved access to delivery and retail services. It is very important to discuss this option with the carrier and other delivery personnel.

24 Customer Questionnaires

241 Purpose

Questionnaires are used to gather additional information about a community, its postal customers and their access to delivery and retail services. This information helps the Postal Service to determine the service needs of the community. The information also helps in assessing the most efficient and economical way to provide those services.

242 Preparing the Questionnaire

242.1 Enclosures

242.11 Cover Letter

A cover letter must be included online or enclosed with each printed questionnaire that clearly explains the discontinuance process and why the Postal Service is investigating the possible discontinuance of a facility. The cover letter should include information about the distance to nearby retail facilities, their hours, alternative access channels, and how customers can request curbside delivery. The cover letter should also notify the customer of any possible change in delivery and retail services, and any changes to PO Box fees.

242.12 Questionnaire

The customer questionnaire containing the name of the retail facility under study and the customer's address should be mailed to all PO Box and carrier delivery customers in the ZIP Code area of the facility under study. The questionnaire should also be mailed to all customers in other ZIP Codes to whom the retail facility under study provides allied delivery services, such as retrieval of held mail. The mailing should include the cover letter, customer questionnaire, copy of the Summary of Postal Service Retail Facility Change Regulations, and a pre-addressed postage paid envelope for return of the questionnaire.

The questionnaire, customer letter, and *Summary of Postal Service Retail Facility Change Regulations* should be posted in the lobby of the affected retail facility with an indication that copies are available upon request.

Customers formerly served by a Postal Service-operated retail facility in suspension status should receive the same level of notice as they would have if the facility were not in suspension status, including notice by mail.

242.13 Preparing the Questionnaire

The cover letter and questionnaire containing the name of affected retail facility and customer's address should be prepared to include the date the completed questionnaire should be returned. Additional cover letters and questionnaires should be prepared with the affected retail facility name and designated space for customer to complete their name and address.

The additional questionnaires are to be placed in the local installation for walk-in customers and for delivery customers requesting to complete more than one questionnaire per household.

242.14 **Receipt of Customer Feedback**

Customers should be provided a deadline, five to seven days from the day of receipt, to enter their feedback online or return the printed questionnaire. Customers should also be provided a phone number for the district Consumer & Industry Contact Office and the PO Box address designated for discontinuance communications. Written comments may be hand-delivered to the local postmaster, OIC, or other responsible personnel, who should forward such comments to the Manager, Consumer and Industry Contact. The Manager, Consumer & Industry Contact, is responsible for answering customer questionnaires, as appropriate, and ensuring that the Discontinuance Coordinator is provided copies of all customer letters and responses, which become part of the official record. When appropriate, certain personally identifiable information, such as individual names, and residential addresses and telephone numbers, may be redacted from the publicly accessible copy of the record. See subchapter [26](#) for how to handle customer comments.

243 **Analyzing Customer Questionnaires**

After the response deadline expires, the Discontinuance Coordinator timely prepares a questionnaire analysis. Maintain copies of returned questionnaires and response letters for inclusion in the official record, including those submitted after the deadline. (Written customer comments submitted at any time, and responses, should always become part of the official record.)

244 **Management's Recommendation**

244.1 **District Review**

The Discontinuance Coordinator must thoroughly review the official record to ensure compliance with federal law, Postal Service policy, and the instructions in this handbook.

When the initial investigative data are compiled and analyzed along with the customer questionnaire results, the MPOO makes a recommendation to the District Manager whether to pursue the discontinuance and, if so, the preferred alternate service. The justification for discontinuance must be documented in the record.

244.2 **Headquarters Preliminary Review**

After the initial review and the MPOO's recommendation to proceed with study, the Headquarters Review Coordinator reviews the information in the record to ensure that appropriate justification and documentation are in accordance with federal law and Postal Service policy. If there are no issues or problems, the district Discontinuance Coordinator will be notified to proceed with the feasibility study.

244.3 Justification for Discontinuance

The justification for proceeding with a discontinuance must relate to the criteria in [321](#).

244.4 Decision to Post Proposal

After the Headquarters Review Coordinator confirms that the review complies with federal law and Postal Service policy, a formal proposal to discontinue the facility is prepared and forwarded to the District Manager for review and concurrence before it is posted. See chapter [3](#) for further information on the proposal.

25 Community Meeting

251 General

A community meeting can be held anytime after the questionnaire is sent (see [242.12](#)) and before any final determination is expected to be made, unless otherwise authorized by the Vice President, Area Operations, or the Vice President, Delivery and Post Office Operations. A community meeting should be forgone only where exceptional circumstances make a community meeting infeasible, such as where the community no longer exists because of a natural disaster or because residents have moved elsewhere.

At the community meeting, customers should be provided with an explanation for the proposed change in service. State the advantages and disadvantages for customers and for the Postal Service (for example, tell customers whether their address will be affected and whether PO Box fees will change if they choose service at a neighboring retail facility). Make it clear that no final decision has been made. Do not argue or raise your voice with customers. Always tell them the truth. If the answer to a customer's question is not apparent, obtain the customer's name and address and respond in writing after the meeting. Make notes of customer concerns and responses for inclusion in the official record. However, do not tape the meeting, because this inhibits open discussion. Immediately terminate the meeting if you feel your safety or the safety of others is at risk.

251.1 Selecting Date and Location

The Marketing Manager should discuss the time and location of the community meeting with the Postmaster, OIC, or other responsible personnel. Be sure to schedule the meeting at a time that encourages customer participation, such as during an evening or weekend. Potential community locations include a community center, church meeting room, city hall, school, or the postal retail facility. Designate a set time for the meeting, but be flexible enough to extend the meeting if necessary to answer customer questions. Dress appropriately for the community. If a second meeting is warranted, plan and schedule it according to the same guidelines as the initial meeting.

251.2 Notifying Customers

Notify customers of the community meeting date, time, and location at least five to seven days in advance. If you receive information that the time is inconvenient for most customers, reschedule the meeting at a more convenient time.

252 Preparing for the Meeting

Begin preparations for community meeting immediately upon the official decision to undertake a study. The District Manager should coordinate the following activities:

- a. The Discontinuance Coordinator prepares a briefing sheet and management presentation, and prepares copies of the briefing sheet for handout at the meeting.
- b. The Manager, Marketing, finalizes the meeting logistics.
- c. The Discontinuance Coordinator prepares sign-in sheets and cluster box unit (CBU) hand-outs, if applicable.
- d. The District Manager conducts a readiness teleconference five days prior to the meeting.

253 Conducting the Meeting

The Manager, Marketing, has the overall responsibility for the community meeting. The Discontinuance Coordinator should assist with coordinating the following activities:

- a. The Manager, Marketing, sets up the meeting location and required equipment.
- b. The Discontinuance Coordinator places the sign-in sheet near the entrance of the meeting room and encourages customers to sign in.
- c. The District Manager or MPOO conducts the Management Presentation and provides responses to customer questions.
- d. The Manager, Consumer and Industry Contact, with assistance of the Discontinuance Coordinator, has responsibility for collecting customer comments and management responses.

254 Analyzing the Meeting

After the meeting, categorize customer concerns as postal and non-postal. Indicate the number of customers expressing each type of concern. Also indicate the Postal Service response. Consumer and Industry Contact has responsibility for providing written responses to any customer questions that were unanswered at the meeting. A record of the customer inquiries and responses should be handled as in [26](#).

26 Customer Comment Letters

A written response must be sent to each customer comment. The response must address the individual concerns expressed by the customer. Consumer and Industry Contact should tailor core letters, as appropriate, to respond to customer comments.

261 **Centralized Location**

To simplify maintenance of a centralized channel for customers' written comments and questions, they should be directed, whenever possible, to a single PO Box address. If customer correspondence obviously related to the discontinuance is received elsewhere it should be forwarded to or deposited at the PO Box designated for the discontinuance study.

262 **Customer Response Letters**

The Manager, Consumer and Industry Contact, is responsible for customer response letters using established Headquarters procedures. The customer letter and each response must be provided to the Discontinuance Coordinator for inclusion in the official record. When appropriate, certain personally identifiable information, such as individual names or residential addresses/telephone numbers should be redacted from publicly accessible copies of the record. If a core response is not available, Consumer and Industry Contact requests assistance from the Discontinuance Coordinator to develop an appropriate response.

263 **Excessive Volume of Comments**

If the volume of correspondence received exceeds the ability to respond in a timely manner, the Manager, Consumer and Industry Contact, notifies the Discontinuance Coordinator who seeks and coordinates field support, with the assistance of the MPOO.

3 The Proposal

31 General

311 **Discontinuance Coordinator Responsibilities**

The Discontinuance Coordinator is responsible for overseeing the gathering and preservation of the official record containing all documentation used to assess any proposed change. All internal and external communications related to the discontinuance, including documents shared at the community meeting or otherwise, must be placed in the administrative record. If the proposed action appears warranted, a formal proposal to discontinue the facility is prepared and forwarded to the District Manager for review and concurrence before it is posted.

311.1 **Memorandum to the Record**

If, at any time, discrepancies or inconsistencies appear in the record documentation, the Discontinuance Coordinator should explain and resolve the matter by preparing a written explanation for inclusion in the record (memorandum to the record). Any memorandum to the record must reflect the date responsive information was obtained as well as the date of the memorandum's inclusion in the official record.

311.2 **Proposal Checklist**

When investigation of the feasibility of a possible discontinuance reaches the stage where a formal proposal to discontinue an independent Post Office, Classified Station, or Classified Branch is prepared for posting, the Discontinuance Coordinator must thoroughly review the proposal and supporting record before the 60-day posting period. The Discontinuance Coordinator must complete a proposal checklist to certify that the review has been conducted and that all necessary investigation has been undertaken and documented in the official record.

311.3 **Log of Post Office Discontinuance Actions**

The Discontinuance Coordinator must maintain a log of discontinuance actions for each independent Post Office, Classified Station, or Classified Branch that is investigated for possible discontinuance. The log must include the name, title, and telephone number of the coordinator most familiar with the case. It must be current and available at all times. A copy of the log must be included in the official record.

312 Official Record

312.1 Review of Official Record

The Discontinuance Coordinator must thoroughly review the record to eliminate any inconsistencies, errors, or omissions. It may be necessary to add additional clarification or to correct deficiencies, update PS Form 4920, *Discontinuance Feasibility Study Survey*, with current information, or re-post an incorrectly posted proposal. See [311.1](#) for information about explaining discrepancies or inconsistencies with a memorandum to the record. The Discontinuance Coordinator must validate and expressly enter into the record the log of discontinuance actions. This validation and entry certifies that the record is ready for review by the Vice President, Delivery and Post Office Operations, and, in the event of an appeal, that it is appropriate for review by the Office of General Counsel and the Postal Regulatory Commission. See [311.3](#) for information about the log of discontinuance actions.

312.2 Copies of Record Documents

The official record containing original documents or their electronic counterparts is kept at the district level. The Discontinuance Coordinator is responsible for updating the official record from the time it arrives at the district until the end of the discontinuance process. The final entry to the record is the Postal Bulletin Retail Facility Change Announcement. The original official record is filed in district archives. Other copies of the record may be destroyed at the discretion of the District Manager.

313 Archiving Official Record

313.1 Preparing to Archive Record

Before permanently closing the record to be filed in district archives, the Discontinuance Coordinator must review the record documentation from the time the record was transmitted to Headquarters for final determination to ensure that all subsequent occurrences are documented chronologically. (Documents filed in the official record must be entered chronologically.) Examples of required documents include:

- a. Final determination and round-date stamps of posting and removal dates in each location.
- b. Copy of the completed Postal Bulletin Retail Facility Change Announcement form.
- c. Appeal notices, pleadings, and decision (when appropriate).
- d. Copy of the instructions to the local address management office to update the Address Management System (AMS) report.
- e. Copy of the published Postal Bulletin Retail Facility Changes Announcement.

313.2 Archiving Record

In accordance with Electronic Records and Information Management Systems (eRIMS), the complete archived electronic record must be kept for

two years from the end of the calendar year in which the final decision is made. The record may be disposed of after that time at the discretion of the District Manager. Electronic copies of the record (see [312.2](#)) must be kept at the district office for six years from the end of the calendar year in which the final decision is made.

32 Components of the Proposal

321 **Description**

The proposal must describe and analyze all details sufficiently that both customers and senior management understand the nature and cause of the proposed change in service and the details of the replacement service. The proposal must address each of the areas described in [321.1](#) through [321.7](#) below.

321.1 **Responsiveness to Community Postal Needs**

It is the policy of the government, as established by law, that the Postal Service provide a maximum degree of effective and regular postal services to rural areas, communities, and small towns where Post Offices are not self-sustaining. The proposal should compare and contrast postal services available before and after the proposed change; describe how the changes respond to the postal needs of the affected customers; and highlight particular aspects of customer service that might be more or less advantageous to respective customers. The proposal should include information about distance to nearby retail facilities, their hours, alternative access channels, and how customers can request curbside delivery.

321.2 **Effect on Community**

The proposal must include an analysis of the effect the proposed discontinuance might have on the community served by the retail facility.

321.3 **Effect on Employees**

The proposal must summarize the possible effects of the change on the Postmaster (if applicable) and other employees of the installation considered for discontinuance. The District Manager must suggest measures to comply with personnel regulations. (See the *Employee and Labor Relations Manual*.)

321.4 **Economic Savings**

The proposal must include an analysis of the economic savings to the Postal Service from the proposed action, including the added expense or cost savings expected from each major factor contributing to the overall estimate.

321.5 **Other Factors**

The proposal should include an analysis of other factors that the District Manager determines necessary for a complete evaluation of the proposed change, whether favorable or unfavorable. If not already addressed elsewhere, explain how unusual services furnished to customers, such as reading mail to illiterate or blind customers, or special accommodations for

physically challenged customers, can be provided upon discontinuance. An environmental checklist or memorandum must be reviewed and considered.

321.6 **Summary**

The proposal must include a summary that explains why the proposed action is necessary and assesses how factors supporting the proposed change outweigh any negative factors. In taking competing considerations into account, the need to provide effective and regular service is paramount.

321.7 **Notice**

The proposal must include the following notice:

- a. *Supporting Materials (all facility types)*. “Copies of all materials on which this proposal is based are available for public inspection at _____ during normal office hours.”
- b. *Proposal (facility not suspended)*. “This is a proposal. It is not a final determination to (close) (consolidate) this facility. If a final determination is made to close or consolidate this facility, after public comments on this proposal are received and taken into account, a notice of that final determination will be posted in this facility.”
- c. *Proposal (suspended facility)*. “This is a proposal. It is not a final determination to (close) (consolidate) this facility. If a final determination is made to (close) (consolidate) this facility, after public comments on this proposal are received and taken into account, a notice of that final determination will be posted in the (name of administrative office).
- d. *Appeal rights (Post Offices only, whether suspended or not suspended)*. “The final determination will contain instructions on how affected customers may appeal that decision to the Postal Regulatory Commission. Any such appeal must be received by the Commission within 30 days of the first day of posting of the final determination.”

33 Official Administrative Record

331 **Description**

The official record includes all information that the District Manager has considered, and the decision must stand on the record. No written information or views submitted by customers may be excluded, whether they support the proposal or not. The discontinuance process can be lengthy, and more than one Discontinuance Coordinator may be involved in the investigation. The official record must be updated and maintained in an accurate and timely manner to assist new coordinators and others who review record documentation.

332 Format

The record must be maintained in the following format:

- a. The record is assigned a docket number, which is the ZIP Code™ for the Post Office, Classified Station, or Classified Branch studied for possible discontinuance.
- b. Upon inclusion in the record, each document is assigned a sequential number that becomes its item number. The docket number and item number are placed in the upper right corner of each document when entered into the record.
- c. A numeric rather than alphabetical numbering system is used. Page numbers can be assigned consecutively throughout the document and/or consecutively within each item. Page numbers should also be placed in the upper right corner of each page within every document, below the docket and item numbers.
- d. Items are filed in chronological order. As written communications are received in response to the public notice, invitation for comments or otherwise, each is included in the record (usually, but not necessarily, together with its written response).
- e. A chronological index is included that identifies each document by item number and the date entered into the record.
- f. The entire record is bound in a folder that opens from the side. A label bearing the installation name and docket number is displayed on the folder cover.

333 Content

These conditions apply to the content:

- a. Do not refer to individual customers by name in the index or proposal.
- b. Ensure that photocopies or scanned versions of documents in the record are legible, and that *both sides of two-sided documents are included*.
- c. Ensure that each statement in the proposal is supported evidence in the record.
- d. Include updated PS Form 4920 to reflect updated information when necessary. If operations in an office are suspended, copy the information that has not changed and update other data on the new PS Form 4920. Keep old PS Forms 4920 in their chronological place in the record.
- e. Review the record to ensure it is accurate and in compliance with federal law, Postal Service policy, and the instructions in this handbook.

334 Availability of Record to Public

A complete copy of the record must be available for public inspection during normal office hours at the installation under study for discontinuance or, if the installation has been temporarily suspended, at the installation providing alternative service, as well as any office likely to serve a significant number of

customers of the office under study. The public inspection period must begin no later than the date when the proposal is posted and extends through the posting period. Provide copies of documents in the record on request and collect payment of any fees prescribed by chapter 4 of Handbook AS-353, *Guide to Privacy, the Freedom of Information Act, and Records Management*. Provide copies of the proposal and comment form on request without charge.

34 Writing Tips

341 Numbers

- a. Always spell out a number that begins a sentence. Example: “Twenty-five customers attended the community meeting.”
- b. For consistency, use the same style to express related numbers. Example: “Seventeen Post Office Box and six general delivery customers chose the same type of delivery at the Skyline Post Office, 10 miles away, rather than accepting rural route delivery to CBUs.”
- c. In general, spell out numbers one to nine, and use figures for numbers above nine. If numbers one to nine precede any unit of measurement or time, use figures. As noted in item b above, use the same style to express related numbers. If most of the numbers are below 10, spell out those that are below 10. If most of the numbers are above 10, express them all in figures.
 - **Example A** (most numbers are below 10): There are two mills, one school, one church, and 21 stores in the community.”
 - **Example B** (most numbers are above 10): The Little Towne Post Office serves 97 rural route customers, 57 Post Office Box customers, and 9 general delivery customers.”

342 Contractions

Avoid use of contractions, such as “can’t” or “couldn’t.”

343 Time

Throughout the proposal, type the abbreviations A.M. and P.M. in small letters followed by periods, but no spaces.

Prior to suspension of service, the Furry River Post Office provided service from 7 A.M. to 12 noon and from 3 to 6 P.M. on Monday through Friday, and from 7 to 11 A.M. on Saturday.” (Notice that when using A.M. to A.M. and P.M. to P.M., the first A.M. or P.M. is omitted.)

344 Customer Names

Do not refer to individual customers by name in the proposal or in the official record index. Do not refer to customers using terms that might be understood as lacking respect, e.g., senior citizens as “old people,” “old folks,” or “elderly.”

35 60-Day Posting Period

351 **Before Posting**

351.1 **Discontinuance Coordinator Review**

Before posting, the district Discontinuance Coordinator validates the proposal checklist and certifies that the review has been conducted and all required activities performed.

351.2 **Notification to Government Relations and Public Policy**

The District Manager must provide advance notification to Government Relations and Public Policy at Headquarters and to Area Public Affairs before posting the proposal for the 60-day posting period. An electronic copy of the proposal should be provided with this notification.

352 **Posting**

352.1 **General**

A copy of the written proposal and an invitation for comments must be prominently posted for at least 60 days in the retail facility under study, the retail facility proposed to serve as the supervising facility, and any facility likely to serve a significant number of customers of the retail facility under study. Always begin the count at day zero, with the day after posting becoming day one. For offices whose operations are suspended, the posting instead takes place at the Postal Service-operated retail installation(s) providing alternative service, since that is where customers can see it. The proposal and invitation for comments must be round-date-stamped on the date of posting and the date of removal. Provide the affected facilities with additional copies of the proposal and comment forms to be given to customers on request. A copy of the official record must also be available at affected facilities for public inspection during normal office hours. Copies of documents in the official record are available in accordance with [334](#).

352.2 **Letter of Instructions**

The Discontinuance Coordinator sends a letter of instructions, and copies of the proposal and invitation for comments, to responsible personnel at each affected facility for posting as required by [352.1](#). The letter of instructions explains procedures for posting the proposal and the invitation for comments. Include in the letter the dates for posting (at least 60 days). In computing the posting days, begin the count with zero as the first day and include every calendar day thereafter for at least 60 days. This computation ensures that the proposal is available for the mandatory 60 days required by law. Documents should be posted at the start of business hours and removed on the appropriate day at the close of business.

352.3 **Invitation for Comments**

An official invitation for comments must be round-date-stamped and posted, at the same time as the proposal, for at least 60 days. The invitation for

comments must state a deadline for customer comments. The invitation must also include the name and telephone number of the Postal Service representative to contact about the proposal and must indicate that copies of the proposal and comment forms are available on request in the affected facilities.

352.4 **Comment Forms**

Comment forms, along with a copy of the proposal, must be made available to customers on request. No fee is charged for these copies. Use this form only during the 60-day posting period. Any comment forms completed by customers and provided to responsible persons must be promptly forwarded to the Discontinuance Coordinator.

353 **After Posting**

353.1 **Letter of Instructions**

Before the end of the 60-day posting period, the Discontinuance Coordinator must send instructions for removal of the proposal and the invitation for comments to responsible personnel at the affected facilities where the proposal is posted under [352.1](#). The instructions must provide the date for removing the proposal and the invitation for comments. The instructions must also advise the responsible facility personnel to round-date-stamp the proposal and the invitation for comments on the date of removal and return them, with the official record, to the Discontinuance Coordinator. The instructions must also include guidelines for posting the *Notice of Taking Proposal and Comments Under Internal Consideration*.

353.2 **Notice of Taking Proposal and Comments Under Internal Consideration**

Responsible personnel at the affected facilities where the proposal has been posted under [352.1](#) must post a *Notice of Taking Proposal and Comments Under Internal Consideration* after the 60-day posting period. This notice should be posted until further instructions are received from the Discontinuance Coordinator.

353.3 **Analysis of Comments**

The Discontinuance Coordinator prepares an analysis of customers' written comments. Group the comments by the type of concern (postal and non-postal) and by subject. Indicate the number of customers expressing each concern. If no comments are received, the Discontinuance Coordinator prepares a memorandum for the record stating that no comments were received. If possible, comments subsequently received should also be included in the analysis. The analysis should list and briefly describe each point favorable to the proposal and each point unfavorable to the proposal. To the extent possible, the analysis should identify how many comments support each point listed. After completing the analysis, the District Manager must review the proposal and re-evaluate all the tentative conclusions previously made in light of additional customer information and views in the record.

353.4 Response to Customer Comments

A written response must be sent to each customer comment. The response must address the individual concerns expressed by the customer.

36 Revising Proposal

361 Definition

A revised proposal contains new information obtained during and after the 60-day posting period. In essence, it is a new proposal that updates the original proposal. If there are no changes to the original proposal and no comments were received, a revised proposal is not necessary. However, a memorandum should be included in the record stating the dates and locations the proposal was posted while noting that no comments or other reasons for modifying the proposal have triggered revision.

362 Components of Revised Proposal**362.1 Description**

Most sections in a revised proposal are identical with the original proposal. Exceptions are listed in the following sections. Be sure to substitute the terms “revised proposal” throughout the text where appropriate.

362.2 Cover Page

Change the cover page to read “revised proposal.”

362.3 Responsiveness to Community Postal Needs

Update the proposal to include information about posting of the original proposal, comments received, and Postal Service responses to those comments. State the number of comments received and indicate whether each was favorable or unfavorable. List each concern, the number of customers expressing that concern, and the Postal Service response.

362.4 Effect on Community

Make sure that this section reflects current information about the community. For example, ensure that businesses are listed correctly. If information in the official record is ambiguous or incorrect, resolve the ambiguity or error using a memorandum to the record.

362.5 Effect on Employees

Note any changes that have occurred since the 60-day posting period.

362.6 Economic Savings

Update salary information and other economic factors, as appropriate.

362.7 Summary

Revise the summary to include information regarding posting of the original proposal at respective locations and any comments received.

362.8 Notice

Change the word “proposal” to “revised proposal” where appropriate.

363 60-Day Posting Period

If a significant change is made in the proposal (e.g., a change in the proposed type of alternative service), repost the revised proposal with an invitation for comments for a new 60-day posting period. Use the procedures in [352](#).

363.1 Significant Change

The following is an example of a significant change. The original proposal was to extend rural delivery. After reviewing customer comments, it is determined that a contractor-operated retail facility would better meet the needs of the community. The revised proposal entails establishment of a contractor-operated retail facility instead. This revised proposal must be posted for a new 60-day posting period. After that, follow the procedures in [353](#).

4 Final Determination

41 District Review

411 **Official Record**

The official record must be thoroughly reviewed, and the reason for discontinuance must be documented in the record. The more recent PS Form 4920 and, if applicable, the revised proposal, must reflect current information. The Discontinuance Coordinator must thoroughly review the official record to ensure compliance with federal law, Postal Service policy, and the instructions in this handbook.

412 **Log of Discontinuance Actions**

Before forwarding the official record to the District Manager and Headquarters, the Discontinuance Coordinator must certify and enter into the record, a completed log of discontinuance actions. This log certifies that a thorough review of the official record is completed and that everything is in order. It is the Discontinuance Coordinator's responsibility to update the log throughout the discontinuance process.

413 **Transmittal from Manager, Post Office Operations**

The Manager, Post Office Operations (MPOO), must transmit a memorandum to the District Manager along with a complete copy of the official record.

414 **Certification of Record**

After a complete review of the record is conducted and necessary updates and corrections are made, the District Manager prepares a memorandum for the record certifying that all comments and documents in the record are originals or true copies of the originals.

415 **Review and Re-evaluation by District Manager**

The District Manager must review the proposal and re-evaluate all previous conclusions in light of additional customer information and views in the record, as well as the MPOO's memorandum. The District Manager must then decide whether the proposed discontinuance is warranted.

415.1 Proposal Not Warranted

If the District Manager decides against the proposed discontinuance, the District Manager must then prominently post a notice in the affected facilities where the proposal was posted under [352.1](#). The notice must state that the proposal has been found unwarranted and that no further action on the proposal to discontinue the installation is planned. The following are examples of reasons why a proposal may not be warranted:

- a. The reason for the discontinuance is inappropriate or based solely on operation of a small Post Office at a deficit.
- b. Documentation in the record does not support the proposal.
- c. The proposed alternate service does not provide effective and regular service to the community.
- d. The discontinuance investigation was not conducted in accordance with the law and Postal Service policy.

415.2 Proposal Warranted

If the District Manager decides that the proposed discontinuance is justified, the District Manager provides a complete file of the official record to the Vice President, Delivery and Post Office Operations, at Headquarters. In his or her transmittal, the District Manager must certify the official record is complete and that all documents in the record are originals or true and correct copies.

42 Headquarters Review

421 General

At Headquarters, the Vice President, Delivery and Post Office Operations, forwards the official record of the proposed discontinuance to the Headquarters Review Coordinator. The Headquarters Review Coordinator reviews official records in the order received, except in special circumstances. Each proposal is evaluated on its own merit. Final determinations and any decision on appeal must rely exclusively and completely upon information in the official record. Thus, *thorough documentation is of the utmost importance*. If necessary, return the record, with instructions, to the District Manager for additional work. Add a copy of any such instruction and response to the official record.

422 Determinations**422.1 Returned for Further Action or Information**

If the official record contains deficiencies or inconsistencies, it may be returned to the District Manager with instructions to give additional consideration to specific areas in the record or to provide additional information. Include these instructions and the response in the official record. No determination is reached at this point. The District Manager may resubmit the proposal and official record to Headquarters after providing further

documentation or clarification. Follow the procedures in [41](#) for resubmitting proposals.

422.2 **Proposal Not Warranted**

When the Vice President, Delivery and Post Office Operations, determines that the proposal is not warranted, the proposal is denied and no further action may be taken on the record sent. The record is returned to the District Manager and written reasons for the determination are provided. The District Manager must then prominently post a notice in the affected facilities as instructed in [415.1](#).

422.3 **Proposal Warranted**

422.31 **General**

When the Vice President, Delivery and Post Office Operations, determines that the proposal is warranted and no further revision is necessary, authorization to proceed is provided to the District Manager. The Discontinuance Coordinator can proceed with composing the final determination and providing it to the District Manager. The following sections outline discontinuance instructions provided with the final determination document.

422.32 **30-Day Public Notice**

The District Manager must make sure that a copy of the final determination is prominently posted for at least 30 days in the affected facilities where the proposal was posted under [352.1](#). To ensure that the posting is for at least 30 days, begin the count at day zero. A copy of the complete official record must be available for public inspection during normal business hours at each affected facility during the mandatory 30-day public notice period. If there is an error or other reason for amending the final determination, immediately contact the Headquarters Review Coordinator. No changes to a final determination are authorized without Headquarters' approval; if changes are authorized and made, explanation for the change must be appended to the administrative record and the posting period must begin anew. Provide copies of documents in the record to customers on request and collect payment of any fees as prescribed by chapter 4 of Handbook AS-353, *Guide to Privacy, the Freedom of Information Act and Records Management*.

422.33 **Contents of Public Notice**

422.331 **General**

The posting of the final determination must include the following notice: "Copies of all materials on which this Final Determination is based are available for public inspection at the (Facility Name) during normal office hours."

422.332 **Additional Contents of Public Notice for Post Offices**

If the retail facility subject to discontinuance is a *Post Office*, the Final Determination must also include the following notice:

Pursuant to Public Law 94-421 (1976), this Final Determination to (close) (consolidate) the (Facility Name) may be appealed by any person served by that office to the Postal Regulatory

Commission, 901 New York Avenue NW, Suite 200, Washington, D.C. 20268-0001. Any appeal must be received by the Commission within 30 days of the first day this Final Determination was posted. If an appeal is filed, copies of appeal documents prepared by the Postal Regulatory Commission, or the parties to the appeal, must be made available for public inspection at the (Facility Name) during normal office hours.

422.34 **Postal Bulletin Retail Facility Change Announcement**

A *Postal Bulletin Retail Facility Change Announcement* form is also enclosed with the final determination. The MPOO or designee must complete and mail the original and email a copy of the announcement form to the Headquarters Review Coordinator on the day the final determination posting is *removed* (the first day following the completion of the 30-day public notice period). The MPOO must also include a copy of the round-date-stamped final determination cover page from each location where the final determination was posted. At Headquarters, the original announcement form and the copy of the round-date-stamped final determination posting are entered into the official record. At the appropriate time, one copy of the announcement form is forwarded to Address Management at Headquarters for announcing the closure or consolidation in the *Postal Bulletin*; the other is returned to the district for inclusion in the official record. Do *not* reproduce this form. Do *not* mail a copy to Address Management at Headquarters.

Note: In the event that an appeal is postmarked in the 30-day period but received by the Postal Regulatory Commission (PRC) after the 30-day period, the Headquarters Review Coordinator will instruct field personnel on posting requirements.

422.35 **Official Discontinuance**

If there are no appeals to the PRC, the retail facility is officially discontinued, at the earliest, 60 days after the first day of posting of the final determination. Please contact the Headquarters Review Coordinator if a specific date is required for official discontinuance. However, federal law prohibits an official discontinuance sooner than 60 days after the date the final determination was posted. Headquarters sends notice to the District Manager indicating whether an appeal is filed with the PRC. If an appeal is filed, Headquarters provides instructions on how to proceed.

422.36 **Address Management System Database**

When the District Manager receives notification from Headquarters that an appeal has not been filed with the PRC, the Discontinuance Coordinator must instruct the field Address Management unit to update the Address Management System (AMS) database. A copy of that instruction must be entered in the official record.

422.37 **Facilities Database**

The Facilities Database (FDB) coordinator must monitor the system to ensure the facility status is updated to reflect "Closed".

423 Notification**423.1 To Local Officials**

Follow local instructions for reporting an official discontinuance within the district.

423.2 To Customers

Notify affected customers by mail (that is the same customers as in [242.12](#)) of the official closure in writing. Additionally, the notification should also be posted in the lobby of the discontinued retail facility.

5 Appeal Procedures

51 General

511 Who May Appeal

Any person regularly served by a Post Office subject to discontinuance may appeal the decision to the Postal Regulatory Commission (PRC). The Postal Service's legal position is that the PRC does not have jurisdiction to act on challenges to the discontinuance of subordinate retail units (such as Classified Stations and Classified Branches) or contractor-operated retail facilities. Where persons regularly served by another type of USPS-operated retail facility subject to discontinuance file an appeal with the PRC, the General Counsel reserves the right to assert defenses, including the PRC's lack of jurisdiction over such appeals. When it elects not to challenge the PRC's jurisdiction over the discontinuance of subordinate Postal Service-operated retail facilities, the Postal Service does not waive any argument that it may have in federal court or in subsequent PRC proceedings concerning the PRC's authority to adjudicate appeals of subordinate retail facilities.

512 Where to Appeal

All appeals must be directed to:

POSTAL REGULATORY COMMISSION
901 NEW YORK AVENUE, NW, SUITE 200
WASHINGTON, DC 20268-0001

513 When to Appeal

- a. Appeals must be received by the PRC within 30 days of the first day the Final Determination was posted. An appeal is considered to have been received by the PRC as follows:
- b. If the appeal is mailed to the PRC, on the date of the postmark on the envelope or other cover.
- c. If otherwise lawfully delivered to the PRC, on the date determined based on any appropriate documentation or other indicia (as determined under PRC regulations).

514 Notification to District Manager

Headquarters provides notification to the District Manager indicating whether an appeal is filed.

515 **Appeal Documents**

The Office of General Counsel, at Headquarters, provides the District Manager with copies of all pleadings, notices, orders, briefs, and opinions filed in the appeal proceedings on behalf of the PRC or other parties to the appeal. The District Manager must ensure that copies of all these documents are included in the official record. The District Manager must also ensure that copies of these documents are prominently displayed in the affected facilities where the final determination is displayed under [422.32](#). The appeal documents must be made available for public inspection at the same facility or facilities during normal business hours. All documents (except the PRC's final order or decision) must be displayed until the final order or decision issues. The final order or decision must be displayed for 30 days in the affected facilities where the final determination was displayed under [422.32](#). However, the final order or decision must also be displayed in the retail facility subject to discontinuance for 30 days or until the effective date of the discontinuance, whichever is sooner.

52 **Discontinuance Pending Appeal**

An affected installation may be discontinued before the final disposition of an appeal only by the authority of the Vice President, Delivery and Post Office Operations. This authority does not permit discontinuance within the 60-day period after initial posting (see [422.35](#)).

53 **Postal Regulatory Commission Decisions**

531 **Final Determination Affirmed**

If the PRC dismisses the appeal or affirms the Postal Service's determination, the official closing date of the installation must be published in the *Postal Bulletin*, effective after the date of the PRC's decision or order, if not previously implemented in accordance with [52](#). In any event, this authority does not permit discontinuance until 60 days after the first date that the final determination is posted (see [422.35](#)).

532 **Final Determination Remanded**

532.1 **General**

If the PRC remands the Postal Service's determination for further action by the Postal Service, the Vice President, Delivery and Post Office Operations, may determine that the discontinuance is not warranted or may return the proposal for further consideration. The Vice President, Delivery and Post Office Operations, provides instructions to the District Manager on the decision.

532.2 Discontinuance Not Warranted

Based on the PRC's decision or order, the Vice President, Delivery and Post Office Operations, may determine that the discontinuance is not warranted at this time. If so, the Vice President, Delivery and Post Office Operations, provides instructions to the District Manager to that effect. Based on the official record submitted, no further action may be taken to discontinue the affected installation. The District Manager must make sure that a copy of the PRC's decision or order is posted for 30 days at the affected facilities where the proposal and final determination were posted (see [352.1](#) and [422.32](#)). A notice must also be posted at the same affected facilities, stating that the final determination to discontinue the installation is withdrawn and that no changes in service will occur at this time.

532.3 Returned for Further Consideration

Based on the PRC's decision or order, the Vice President, Delivery and Post Office Operations may determine that the discontinuance proposal requires further consideration of other service alternatives or additional investigation and documentation. The Vice President, Delivery and Post Office Operations, provides instructions for further consideration at an appropriate procedural stage.

6 Special Circumstances

61 Suspensions

611 **Definition**

Circumstances that may justify a suspension include, but are not limited to, the following:

- a. A natural disaster.
- b. Termination of a lease or rental agreement when suitable alternate quarters are not available in the community, especially when the termination is sudden or unexpected.
- c. Lack of qualified personnel to operate the office.
- d. Irreparable damage when no suitable alternate quarters are available in the community.
- e. Severe damage to, or destruction of, the office.
- f. Challenge to the sanctity of the mail.
- g. Lack of adequate measures to safeguard the office or its revenues.

612 **Authority**

District Managers may suspend the operations of any independent Post Office, Classified Station, or Classified Branch under their jurisdiction for reasons such as those identified in [611](#).

613 **Notification**

613.1 **To Headquarters**

The District Manager (or a designee) must provide immediate notice of any suspension by email to the Headquarters Review Coordinator or by fax to the Customer Service Operations office at 202-268-2048.

613.2 **To Local Officials**

Immediately notify the local district Facility Database (FDB) coordinator. Contact information for FDB coordinators is available on the Intranet at <http://eagmnsu0fa.usps.gov/fdb-docs/fdbcoordinatorlist.pdf>. Follow local instructions for reporting emergency suspension within the district. Use a copy of the emergency suspension notice for notification to the following:

- a. All direct reports to the District Manager.
- b. The Vice President, Area Operations.

- c. State and national postmaster organizations.
- d. Transportation and logistics.
- e. Philatelic Operations. To stop and resume automatic distribution of commemorative stamps, notify:
 POSTAL ACCOUNTS SECTION
 FINANCE BRANCH
 MINNEAPOLIS ACCOUNTING SERVICE CENTER
 2825 LONE OAK PARKWAY
 EAGAN, MN 55121-9312
- f. Accounting services and Postmaster accounts.
- g. The upstream Processing and Distribution Center(s) responsible for processing mail to and from the relevant retail facility.
- h. Address Management.
- i. Human Resources.
- j. Management at affected facilities, including the suspended retail facility, the supervising office, and the facilities most likely to serve a significant number of customers of the suspended retail facility.
- k. Discontinuance Coordinator.
 - (1) The Discontinuance Coordinator must be immediately provided information to enter in the log of discontinuance actions. That coordinator may be called on to provide information to Government Relations and Public Policy at Headquarters during a Congressional inquiry.
 - (2) A copy of the suspension notice must be placed in the official record when the installation is investigated for permanent discontinuance.
- l. Facilities Service Office for appropriate action regarding the lease and possible alternate quarters.

613.3 **To Customers**

Notify affected customers immediately by individual letter. Include in the notice the following information:

- a. Effective date.
- b. Reason for suspension.
- c. Alternate services available, including how to request curbside delivery.
- d. Nearest retail facilities and hours of service.
- e. Name and telephone number of person to contact for more information.

614 **Alternate Service**

Establish alternate service as quickly as possible. If a discontinuance proposal appears likely, make every effort to provide the alternate service that is most likely to be recommended in the discontinuance proposal. A

change from emergency replacement service often generates community opposition regardless of the rationale.

615 **Employee Reassignment**

Temporarily reassign all eligible employees of the suspended facility according to *Employee and Labor Relations Manual* 354. Reassignment of bargaining-unit employees must be in accordance with the applicable provisions of the National Agreement.

616 **Suspension Review Team**

When a District Manager suspends operations at a retail facility, a suspension review team must be formed to review the decision. The suspension review team members must include the Discontinuance Coordinator; the MPOO or designee; a representative from the Facility Services Office; and in the case of the suspension of a Post Office staffed by a postmaster, state presidents of each postmaster organization or their designees.

- a. Members of the suspension review team must conduct an onsite visit to the suspended facility.
- b. Within 10 business days of the onsite visit, the suspension review team must notify the District Manager and the Vice President, Delivery and Post Office Operations, of their recommendation to suspend or not suspend the facility. In the case of the suspension of a Post Office staffed by a postmaster, the national postmaster organizations are also notified.
- c. If the suspension review team recommends suspension, the formal discontinuance process should be initiated.
- d. If the suspension review team finds that there is insufficient justification to suspend the office, the retail facility should be reopened unless otherwise directed by the Area Vice President or the Vice President, Delivery and Post Office Operations.

617 **Timing of Suspension and Discontinuance Study**

Wherever possible, when an initial feasibility study is to be initiated due to an emergency suspension, initiate the discontinuance process sufficiently in advance of the circumstance prompting the emergency suspension (for example, anticipated cancellation of a lease or rental agreement) to allow a meaningful opportunity for public input to be taken into account before services are suspended. If necessary to continue gathering information, local management should also, to the extent possible, seek to continue operations as long as necessary to reach an outcome in the discontinuance process. In situations where the circumstances prompting an emergency suspension are not known in advance of the emergency suspension, a decision should be made within 90 days of an emergency suspension to secure alternate quarters, take necessary corrective action, or initiate a feasibility study.

618 Plan of Action

If the District Manager determines not to initiate a discontinuance study, the District Manager must determine a plan of action to restore service, secure suitable alternate quarters, or take other necessary corrective action. That plan of action must be provided to the Vice President, Delivery and Post Office Operations, no later than the 90 days after suspension takes effect.

619 Restoration of Service

Immediately notify the Headquarters Review Coordinator of restoration of service by email or fax to the Customer Service Operations office to 202-268-2048.

You must also notify the local district FDB coordinator. Contact information for the FDB coordinators is available on the Intranet at <http://eagnmnsu0fa.usps.gov/fdb-docs/fdbcoordinatorlist.pdf>

62 Name Change

621 General

A Post Office should normally bear the official name of the incorporated city, town, or borough in which it is located, as shown in its charter. A Post Office located in an unincorporated place should generally bear the approved name of the principal community served (normally the community in which located) or the approved name of the town or township, if it serves a number of communities within a town or township.

622 Current Instructions

Information related to facility name and ZIP Code assignments and changes is provided in the *Postal Operations Manual* (POM) 123.4.

623 Use of Branch or Station Designation

Classified Stations, Classified Branches, and non-personnel units are Postal Service-operated subordinate units located within main Post Offices' service areas to provide one or more services at sites convenient to customers. The definitions of Classified Stations, Classified Branches, and non-personnel units are as follows:

- a. *Classified Units*. Classified units are stations and branches operated by Postal Service employees in quarters owned or leased by the Postal Service.
- b. *Stations*. Stations are located within the corporate limits or city carrier delivery area of the city or town in which the main Post Office is located.
- c. *Branches*. Branches are located outside the corporate limits or city carrier delivery area of the city or town in which the main office is located.

- d. *Nonpersonnel Units.* Nonpersonnel units are small, non-staffed stations and branches that are served by a rural carrier in quarters typically provided by a contractor, in which case the contractor also furnishes custodial and security support. A non-personnel unit provides essential mail services on a self-service basis, such as the collection and delivery of mail and the sale of stamps. Non-city carriers are required to remain at non-personnel units for a minimum of 15 minutes each day their routes operate. These carriers provide other services such as the sale of Postal Money Orders and the acceptance and delivery of Certified Mail™, Insured Mail™, Registered Mail™, Delivery Confirmation™, Signature Confirmation™, Collect on Delivery (COD), and all other special services.

63 Merging Facilities

631 Definition

The dictionary definition of merge is “to unite or combine.” In discontinuance investigations, this term is often misused and misunderstood. *Mergers give rise to a discontinuance and should be referred to as such. Do not use the term “merge” in the investigative process or in the proposal; rather, refer to a discontinuance. Coordinators generally define a merge in one of two ways:*

- a. Two or more towns (each with one or more independent Post Offices) combined into a single incorporated village, town, or city with one administrative Post Office.
- b. Two or more towns (each with one or more independent Post Offices) combined by building a replacement facility (centrally located between the existing Post Offices) that serves as the administrative Post Office for all the delivery areas involved.

632 A Hypothetical Situation

632.1 Background

632.11 General

There are two rural unincorporated communities in the same geographical area. Population growth is not great; however, the communities are growing together. Each community has a Post Office. The Post Offices are located within a mile and a half of each other. For simplicity, we refer to these two facilities as Post Office A and Post Office B.

632.12 Post Office A

At Post Office A:

- a. The EAS-13 postmaster position is not vacant. The clerk and rural carrier are career employees.
- b. There are eight hours of service daily, Monday through Friday, and three hours on Saturday.
- c. The building is unsafe because of structural deterioration.

- d. There is a 30-day lease cancellation clause.
- e. There is some growth in the community.
- f. There are 350 customers: 10 general delivery, 100 Post Office box, and 240 rural route customers.
- g. Postal Service revenue has increased each of the past three fiscal years. The average number of daily retail window transactions is 48.
- h. There are two permit mailers.
- i. There are eight small businesses (two are new), two churches, and one elementary school.

632.13 **Post Office B**

At Post Office B:

- a. The EAS-11 postmaster position is vacant. The OIC is non-career. No career employees are at the office.
- b. There are four hours of service daily, Monday through Saturday.
- c. The building is deteriorating and unsafe. No alternate quarters are available.
- d. There is a 30-day lease cancellation clause.
- e. There is low growth in the community.
- f. There are 30 general delivery customers.
- g. Postal Service revenue has declined each of the past three fiscal years. The average number of daily retail window transactions is 11.
- h. There are no permit mailers or postage meter customers.
- i. There are two businesses and one church in the community.

632.2 **Suggested Plan of Action**

632.21 **Post Office A**

Move the Post Office to adequate quarters. The District Manager does not require approval from the Vice President, Delivery and Post Office Operations, to move Postal Service operations from an unsuitable building to a suitable building in a geographical area where customers would have no change in service, address, or ZIP Code. However, the regulations in Title 39, *Code of Federal Regulations*, section 241.4, "Expansion, Relocation, Construction of New Post Offices," must be followed, and a customer who disagrees with a local decision may appeal to the Vice President, Facilities. Explain to customers that the Post Office is not closing but moving to other suitable quarters within the community. Present the positive aspects of the move to the customers. Advise the customers that consideration is being given to serving Post Office B customers from the same facility; in such an event, the Post Office name may change to identify both communities. If it seems desirable to discontinue Post Office B, the best location for Post Office A is midway between the two Post Offices. Make sure that the new quarters can accommodate the workload of both Post Offices' operations. If suitable alternate quarters are not available and a new facility is constructed, the site plans and funding must be available and approved before any

proposal can be presented to the customers. Do not proceed on promises or conjecture.

632.22 **Post Office B**

After Post Office A is moved, propose to discontinue Post Office B. Use as a justification the deterioration of the building (supported by photographs and safety reports), the lack of suitable alternate quarters in the community, and the decline in service needs. Propose Post Office Box and general delivery at Post Office A and extension of rural delivery from Post Office A. Propose a name change for Post Office A to identify both communities A and B. Focus on the positive aspects and service improvements of the change.

632.23 **Post Office Name Change**

Examples of Post Office names for this hypothetical situation are shown below. (Consult your local Address Management unit for name change requirements.)

- a. A and B Post Office.
- b. A Post Office Serving B.

632.24 **Headquarters Review**

When making a proposal similar to this hypothetical situation, remember the following:

- a. The Post Office A move to suitable alternate quarters must be complete or, in the case of new construction, a target date set before sending the proposal to discontinue Post Office B to Headquarters. The final determination to discontinue Post Office B is decided, among other justifications, based on the definite availability of suitable quarters.
- b. Adequate justification for discontinuance must be clearly stated and documented in the official record.

64 ZIP Code Elimination

641 **General**

The ZIP Code for each address formerly served by the discontinued Post Office ordinarily is the ZIP Code of the discontinued Post Office.

642 **Discontinuance**

642.1 **Community Place Name**

In a Post Office discontinuance, it is customary to retain the community place name and ZIP Code of the discontinued facility. If it is determined as necessary to eliminate the ZIP Code of the Post Office proposed for discontinuance, the District Manager must submit a request and justification to the Vice President, Area Operations, for approval.

642.2 Request for ZIP Code Elimination

The District Manager must receive approval *before* telling customers that their ZIP Code will change and *before* the 60-day proposal is posted. The request must include, at a minimum, the number of deliveries affected and the number of unused ZIP Codes remaining in the three-digit ZIP Code area. Justification for ZIP Code elimination should be based on operational requirements.

642.3 Conversion or Consolidation

When a Post Office is consolidated by conversion into a Classified Station or Classified Branch, or when a Postal Service-operated retail facility is consolidated by conversion into a contractor-operated retail facility, the ZIP Code remains the same as the original facility. The Vice President, Area Operations, must approve name and ZIP Code elimination for contractor-operated retail facilities, Classified Stations, and Classified Branches.

642.4 Post Office Box Range

If the retail facility being discontinued has Post Office Boxes, give consideration to the Post Office Box number range. Duplicate Post Office Box number ranges within the same preferred last line (City, State) create problems for mail distribution and ZIP Code assignment. Renumbering Post Office Boxes to eliminate address duplications should be done at the time of the discontinuance.

642.5 Minimizing Address Changes for Customers

It may be necessary to evaluate the feasibility of moving Post Office Boxes to a neighboring office to minimize any customer address or ZIP Code changes. Work with district Marketing and Delivery to determine the most appropriate alternate delivery service that has the least impact on customers. This option is not recommended for customers who are receiving free Post Office Box service because they are not eligible for carrier delivery. In these instances, it is recommended that carrier delivery options including roadside boxes, cluster box units, and/or non-personnel units be pursued before evaluating movement of Post Office Box sections.

642.6 Rural and Contract Delivery Route Numbers and Box Ranges

For pay purposes, rural route or highway contract route numbers should not be duplicated within a finance number. Rural route or highway contract route box numbers may not be duplicated within a route. Renumbering routes and boxes should be done at the time of the discontinuance.

642.7 Customer Notification

Customers should be notified of plans to change Post Office Box numbers and the ZIP Code before the 60-day proposal posting under [35](#). If the address change increases Post Office Box fees for any customers, specific Post Office Box fee information should also be clearly communicated to customers before posting. This applies even when delivery is available and Post Office Box service at a neighboring facility is a customer option.

643 Consolidation**643.1 Community Place Name and ZIP Code**

When a contractor-operated retail facility is established in lieu of a Postal Service-operated retail facility, or when a classified station or classified branch is established in lieu of a Post Office, it is customary to retain the community place name and ZIP Code of the discontinued retail facility. Changes in name and ZIP Codes require the approval of the Vice President, Area Operations.

643.2 Customer Notification

The first notice to customers that consideration is being given to consolidating a Postal Service-operated retail facility and establishing a contractor-operated retail facility, or to consolidating a Post Office and establishing a classified station or classified branch, should state clearly that customer addresses will *not* change (except as approved in accordance with [642](#)).

644 Official Record Documentation**644.1 Post Office Discontinuance**

The official record must include any letter authorizing or denying ZIP Code elimination (see [233](#) and [642.2](#)).

644.2 Post Office Consolidation

The official record must include any letter authorizing or denying ZIP Code elimination (see [233](#) and [642.2](#)).

7 Best Practices in Discontinuance Process

71 Best Practices by Step in the Process

711 **Suspensions**

The following must be accomplished:

- a. Provide sufficient valid reason to suspend.
- b. Provide sufficient documentation justifying suspension.
- c. For Post Offices, involve postmaster and labor organization(s) as appropriate.
- d. Notify and adequately explain reason for suspension to customers.
- e. Identify most likely recommended permanent service as temporary alternate service.
- f. Conduct timely investigations and follow-up. (A plan of action should be sent to the Headquarters Review Coordinator through the Vice President, Delivery and Post Office Operations, within 90 days after the suspension occurs.)
- g. Conduct and document a search for suitable alternate quarters, if applicable.
- h. Conduct and document a search for qualified personnel, if applicable.

712 **Initial Investigation**

The following must be accomplished:

- a. The District Manager or the Vice President, Delivery and Post Office Operations, must give authorization to study.
- b. Adequately investigate alternate services.
- c. Conduct and document search for suitable alternate quarters, if applicable.
- d. Provide sufficient reason or documentation to support discontinuance.

713 **Questionnaires**

The following must be accomplished:

- a. Provide reason for discontinuance or recommended alternate service in cover letter.

- b. Provide address for customer to send written comments in cover letter.
- c. Send surveys in a timely manner.
- d. Thoroughly complete analysis. (Customer concerns should be listed and paraphrased, with the number of customers expressing each concern and the Postal Service response. Concerns should be classified as postal or non-postal.)
- e. Adequately research and address customer comments. A response should be sent to each customer who submits a questionnaire, and the response should address specific customer concerns.

714 **Community Meetings**

The following must be accomplished:

- a. Use the community meeting in all discontinuance actions except as otherwise indicated by the Vice President, Delivery and Post Office Operations, or the Vice President, Area Operations.
- b. Conduct meetings in a timely manner.
- c. Select time and site to encourage customer participation.
- d. Give adequate notice to customers.
- e. Thoroughly record documentation and analysis of meeting.
- f. Present a full range of alternate service options, together with advantages and disadvantages.

715 **Proposal**

Do the following:

- a. Clearly state reason for discontinuance in Section I of the proposal.
- b. Document the record to support the proposal.
- c. Adequately answer customer concerns from questionnaires and community meetings.
- d. Verify existence of any interested offerors when a contractor-operated retail facility is recommended.
- e. Obtain prior authorization from the Vice President, Area Operations, before proposing ZIP Code elimination.
- f. Include information in the record about petitions and Congressional inquiries.
- g. Explain effect on all employees, including those with non-career status.
- h. Post proposal and invitation for comments concurrently in all affected facilities, including the facility under study (if not suspended), the proposed supervising facility, and the facilities most likely to serve a significant number of the delivery or retail customers of the facility under study.
- i. Post proposal and invitation for comments together for at least 60 days (always begin the count at day zero).
- j. Round-date-stamp proposal and invitation for comments on date of posting and date of removal.

- k. Make sure information in the proposal is consistent with PS Form 4920.
- l. Make comment forms and copies of proposal available for customers.
- m. Make official record available at all affected retail facilities.
- n. Thoroughly record analysis of comments.
- o. Respond to customer comments.
- p. Write or prepare revised proposal with information from proposal posting, customer comments on proposal, the community meeting dates, and customer comments submitted at the community meeting.
- q. Accurately state the number of businesses in the community (need to include small and in-home businesses operated from rural residences).
- r. Check with Facility Service Office (FSO) on historical value of building owned or leased by the Postal Service.

716 **Official Record**

The following must be accomplished:

- a. Inconsistencies, contradictions, and anomalies must be clarified in the record by a memorandum to the record.
- b. List docket and item numbers on each document.
- c. Enter documents in chronological order.
- d. Complete or review index for consistency with the entries.
- e. Include legible photocopies or both sides of two-sided documents.
- f. Provide current and complete PS Form 4920.
- g. Update documentation. (Example: The description of community omits or miscounts significant local establishments, such as schools, businesses, and churches, or the analysis of community postal needs omits or miscounts bulk mailing permits.)
- h. Certify record.
- i. District Manager must make transmittal to Headquarters.

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Appendix A

Glossary of Terms

Administrative Post Office	A Post Office that has administrative control or responsibility of a contractor-operated retail facility or Classified Station or Branch.
Affirmed	An appeal decision in which the Postal Regulatory Commission (PRC) agrees with and approves the Postal Service decision to discontinue.
Appeal	After a final determination is posted, a request for review of the final determination that is filed by persons served by the facility being discontinued. The appeal must be filed with the Postal Regulatory Commission in Washington, DC, within 30 days of the first day of posting of the final determination. The Commission then has up to 120 days in which to consider the appeal and issue a decision.
Classified Branch	A retail facility that is Postal Service-operated and is under the administration of an independent Post Office. A branch is located outside the corporate limits or city carrier delivery area of the city or town in which the main Post Office is located. The branch name is generally used in the last line of the address.
Classified Station	A retail facility that is Postal Service-operated and is under the administration of an independent Post Office. A station is located within the corporate limits or city carrier delivery area of the city or town in which the main Post Office is located. The name of the station is generally not used as the city name in the last line of the address.
Closing	An action in which Post Office operations are permanently discontinued without providing a replacement facility in the community. Replacement services are provided by a neighboring Post Office, contract delivery service, rural delivery service, city delivery service, or alternative access channels.
Cluster Box Unit (CBU)	A secure free-standing unit of individually locked mail compartments installed and maintained by the Postal Service at no cost to the customer. These units are placed on the public right of way or other locations adjacent to the existing Post Office carrier's line of travel. Parcel lockers may also be installed for customer convenience.
Community	A general term that denotes a group of individuals, with common interests, living in a particular area. These common interests may arise from social, business, religious, governmental, scholastic, or recreational associations and may involve consideration of shared institutions, traditions, and public services that help bind the people of the community together. Institutions, services, and associations do not always have clear centers or geographic boundaries. A community, therefore, is not necessarily formally organized or confined within corporate limits.

Consolidation	An action that replaces (a) a Postal Service-operated retail facility with a contractor-operated retail facility or (b) an independent Post Office with a Classified Station or Classified Branch. A resulting contractor-operated retail facility reports to a Postal Service-operated retail facility; a resulting Classified Station or Classified Branch reports to an administrative Post Office.
Contract Delivery Service (CDS)	A contract delivery route that provides mail transportation between Post Offices, or other designated points, where mail is received or dispatched. Box delivery, collection service, and other mail services may also be provided on these routes.
Contractor-Operated Retail Facility	A facility that provides selected postal retail services to the public according to a contract with the Postal Service.
Discontinuance	An action in which an independent Post Office, Classified Station, or Classified Branch is permanently closed or consolidated.
Docket Number	A number assigned to the proposal that is the ZIP Code of the office proposed for discontinuance or consolidation. The docket number must be on the top right corner of each page in the official record.
Emergency Suspension	An action in which a District Manager suspends operations of any USPS-operated retail facility in his/her jurisdiction because an emergency or other condition requires such action.
Final Determination	A written decision that approved by the Vice President, Delivery and Post Office Operations, to discontinue an independent Post Office, Classified Station, or Classified Branch. The final determination is based on information in the official record and must be publicly posted for at least 30 days.
Government Relations and Public Policy	The Postal Service organizational unit at Headquarters that investigates and responds to congressional inquiries.
Independent Post Office	An organizational entity subordinate to a district with responsibility for customer services, local delivery, the receipt and dispatch of all classes of mail, and in some instances, processing and distribution of mail for other Post Offices in the surrounding geographic area.
Nonpersonnel Unit (NPU)	A self-service unit that provides essential mail services, such as the collection and delivery of ordinary mail and sale of stamps. Services may include the sale of Postal Money Orders and the acceptance and delivery of Certified Mail, Insurance, Registered Mail, Collect on Delivery (COD), Delivery Confirmation, Signature Confirmation, and other special services. These services are provided to customers of non-personnel units by carriers when they visit the units. Carriers are required to remain at the unit a minimum of 15 minutes each day their routes are scheduled to operate, to afford customers the services not otherwise available from the unit.
Official Record	A chronological file of all information that the District Manager considers in relation to the proposed discontinuance of a retail facility. No information or views submitted by customers may be excluded, whether or not it tends to support the proposal.

Parcel Locker	A compartment in or near a cluster box unit (CBU) that is used for the delivery of packages, large articles, or accumulated vacation hold mail too large to fit in a mail receptacle. The carrier provides a key for the customer at the time of delivery. The key is typically retained in the parcel locker upon retrieval of the mail. This eliminates the need for customers to take delivery of their mail by visiting a USPS-operated retail facility.
Postal Regulatory Commission (PRC)	An independent government agency to which appeals of Post Office discontinuance final determinations are sent. The PRC's address is 901 New York Ave, NW, Suite 200, Washington, DC 20268-0001. An opinion by the PRC is rendered within 120 days of the appeal.
Postal Service-Operated Retail Facility	An independent Post Office, Classified Station, or Classified Branch operated by the Postal Service.
Pre-proposal Investigation	An initial review of the retail facility and the community — along with questionnaires, community meetings, and other activities — that is conducted before the discontinuance proposal is written.
Proposal	A document that explains — both to higher Postal Service managers and to all persons served by the affected retail facilities — the nature and justification of the proposed change in service. The written proposal must address each of the following matters in separate sections: a. Responsiveness to Community Postal Service Needs; b. Effect on Community; c. Effect on Employees; d. Economic Savings; e. Other Factors; f. Summary; and g. Notice.
Remand	An appeal decision from the Postal Regulatory Commission that does not agree with the Postal Service's decision or process to discontinue a Postal Service-operated retail facility and that returns the matter to the Postal Service for further action.
Revised Proposal	A document that includes information relative to the original proposal to discontinue a retail facility, customer comments to the proposal with appropriate Postal Service responses, and any new information not included in the original proposal. A significant change to the original proposal requires reposting the proposal. The format is the same as that for the proposal.
Suitable Alternate Quarters	An available facility that meets the specific requirements of the Postal Service in order to continue Postal Service operations in a community. Criteria for a Postal Service-operated retail facility vary from those of a contractor-operated retail facility.

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Appendix B

References

Administrative Support Manual (ASM)

- 412, Military Post Offices, Establishment and Discontinuance
- 518.2, Facility Planning, Community Contact
- 519.224, Design and Construction, Plaques Honoring an Individual

Domestic Mail Manual (DMM)

- 508.4, Recipient Services, Post Office Box Service

Employee and Labor Relations Manual (ELM)

- 354, Assignment of Unassigned Employees

Postal Operations Manual (POM)

- 123, Post Offices, Stations, Branches, Contract Postal Units, and Nonpersonnel Units

Handbook AS-353, *Guide to Privacy, the Freedom of Information Act, and Records Management*

United States Code (USC)

- Title 39 USC 404(d)

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