

AVALON INDEPENDENT SCHOOL DISTRICT
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November 6, 2011

POSTAL REGULATORY
COMMISSION
OFFICE OF THE SECRETARY

Postal Regulatory Commission
901 New York Ave. West, Ste 200
Washington, DC 20268-0001

Received

NOV 17 2011

RE: Closure of Avalon, Tx Post Office/Letter of Appeal

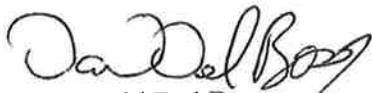
Office of PAGR

Avalon, Texas 76623, is a rural unincorporated farming community 45 mile southwest of Dallas on Highway 34. As superintendent of the Avalon Independent School District, I am writing on behalf of the Board of Trustees and all of our children, teachers and staff. As the largest employer in Avalon, our school district also represents the citizens of this community.

Since the proposal to close our community post office, we have diligently worked and written to all who may be able to help us retain the local services of our post office. It is our hope that you would consider all of our concerns and reconsider the closing of this vital human service to our rural community.

We are very keenly aware of the economic hardships the USPS faces. However, perhaps there are other post offices, in more populated areas that have several retail postal services that can be considered before the one in Avalon. Again, we are appealing to you to please find a way to keep our post office open if possible.

Best regards and thank you for your consideration,



Dr. David Del Bosque
Superintendent, Avalon ISD
Chairman of Save the Avalon Post Office

Received

NOV 17 2011

Office of PAGR

The Avalon community has received its final determination letter to close its post office. We feel the loss of the delivery of human services, via its retail postal services, would have a powerful negative effect on the community. This human service is of such great importance and its loss merits our appeal for a reconsideration of said closure. We respectfully ask that our concerns be noted and it be reconsidered on the basis of the need and benefit of our citizens, patrons, and future economic prosperity of our rural way of life. Our appeal is straight forward and provides a counter response to every finding of the closure summary report.

The office is scheduled for closure or consolidation due to the following reasons: The office is currently vacant and earns less than 2.00 hours daily thus performing below standards to operate as an independent Post Office. Effective and regular service will continue via rural route service with retail services provided by the carrier alleviating the need to travel to a Post Office for service.

Save the Avalon Tx Post Office Response:

To our knowledge, a posting of vacancy was never done. If a lack of postmaster is a reason for closure – no attempts were made to fill the need via job vacancies to the Avalon public. If there was, the attempt was not transparent.

The Avalon Post Office, an EAS-11 level, provides service from 07:00 to 12:00 – 12:00 – 16:00 Monday –Friday, 07:00 – 9:45 Saturday and lobby hours of 24 hours on Saturday to 165 post office box or general delivery customers and no delivery customers. Retail services included the sale of stamps, stamped paper, and money orders; special services such as Registered Mail, Certified Mail, Insured Mail, COD Mail, and Express Mail services; and the acceptance and dispatch of all classes of mail.

The retail window averaged 17 transactions(s) accounting for 19 minutes(s) of retail workload daily. With minimal workload, the Postal Service that effective and regular service will be provided by rural route service. Office receipts for the last 3 years were: \$30,070 (78 revenue units) in FT 2008; \$27,238 (71 revenue units) in FY 2009; and \$22,188 (58 revenue units) in FY 2010. There were no permit mailer(s) or postage meter customers(s).

Save the Avalon Tx Post Office Response:

There are, in fact, two postage meter customers in Avalon – Avalon ISD and Phillips Services Corporation. Neither entity had credited postage purchases in the report. Avalon ISD, for example, purchases at least \$1500.00 per year in metered postage.

(COPY OF REPORT)

Economics Savings: The report breakdowns savings by closure as follows:

Postmaster Salary (EAS-11, No COLA)	\$33,168
Fringe Benefits @ 33.5%	\$11,111
Annual Lease Costs	\$5400
Total Annual Costs	\$5,400
Less Annual of Replacement Service	-0
Total Annual Savings	\$49,679

A one-time expense of \$ 7,969 will be incurred for installation of CBUs and 0 parcel lockers

Save the Avalon Tx Post Office Response:

*** The economic savings presented above later in this report do not include revenue generated in fiscal year 2010 in the amount of \$22,188 (58 revenue units). Additional revenue not included in the economic savings above is the \$5,400 in annual rental fee to the owner (\$450 per month through end of the lease in 2014).*

Economic Savings including 58 revenue units and rental fees

*\$49,679 (original annual savings)
\$22,188 (58 revenue units)
\$5,400 (rental fees that will still need to be paid per lease contract)*

*Total Actual
Annual Savings **\$22,091** – NOT the \$49,679 as listed in the report*

The USPS is a fundamental governmental service necessary for a modern and industrialized society. Non-Closure of the Avalon Post Office is critical for the continued modernization and

future growth of the community. We urge you to reconsider and revisit the above actual savings compared to the identity loss of a vibrant healthy community.

On June 01, 2011, representatives from the Postal Service were available at to answer question and provide information to customers. 73 customer(s) attended the meeting.

Save the Avalon Tx Post Office Response:

The meeting was held at 2:00 in the afternoon and on a Tuesday. This time made it difficult for citizens to attend as it was conducted during normal work hours when most people could not attend. When USPS was questioned about the time selection the response was that his schedule did not allow for any other time but that he did have other meetings that evening. The practice of "for the good of the many" in this instance was out-weighed by USPS restrictive scheduling practices, especially those during customer's work hours. It is our opinion that this was not in the best interest of the community. The original meeting was scheduled to be held in the post office. After phone calls from the local school district about the restrictive space and time for the expected community attendance, the meeting place was moved to the school lunch room to accommodate a larger audience. The time was however not changed.

USPS Report

On May 16, 2011 226 questionnaires were distributed to delivery customers of the Avalon Post Office. Questionnaires were also available over the counter for retail customers at the Avalon Post Office. 53 questionnaires were returned. Responses regarding the proposed alternate service were as follows: 0 favorable, 19 unfavorable, and 34 expressed no opinion.

Save the Avalon Tx Post Office Response:

We have two major concerns regarding the questionnaires and subsequent summary report:

#1 - Readability of the summary report:

The Flesch Reading Ease was used to measure the readability of the report. Under analysis, the written summary report produced a reading index of 38.2. This index would indicate this report to be written at a reading level that is considerably higher (more difficult) than the standard reading level of 60-69. If the intent of the report was to produce findings that the general public can decipher, it was not written in such a manner. It is filled with acronyms specific to the postal service and not the general population. A Flesch Reading Ease score of 38.2 would suggest that the document is difficult to understand, and is near the index of 30 producing a document that is considered highly technical and very difficult to read.

Additionally, the document produced a Fleschman Grade Level readability score of 11.8. This index is considerably higher than a standard reading level of 7-9 used for most public reading consumption. It is our opinion that the ease score produces such a high difficulty reading level of the document that it provides a basis for "no opinion" since many readers may have difficulty understanding the technicalities and intricacies of the information (as a point of reference: this paragraph produces a Flesch Reading Ease Score of 31.1 and a Fleschman Kincaid reading level of 14.3).

#2 - Questionnaire Reliability and Validity:

The questionnaire used a four-point Likert Scale for question #3 as means of eliciting responses: (1) Better (2) Just as Good (3) No Opinion (4) Worse. However, the report lists only three: 0 favorable, 19 unfavorable, and 34 expressed no opinion that were selected. The reporting of the selections is problematic since it does not correspond to the selections from which the customer was asked to judge. There are four choices on the questionnaire, yet only three are indicated in the report and also reworded.

The "No opinion", thus, seems to be taken as a negative response. Changing the recording of the responses alters the standardization of the questionnaire and invalidates the question and in our opinion should not be considered as indicative of the community support for its post office. The 81 attendees at the meeting far outweigh the responses that were received. Furthermore, on the questionnaire, there are two lines underneath the choices which says "If yes, please explain...". "Yes" is not a choice, so the customer would not have known how to respond. It can be concluded that those who selected "No Opinion" did so because of the confusion of the question or the lack of information given at the meeting – not to be taken as a negative response or an indication that customers do not care about the closure of their post office.

The 81 people who were at the "information" meeting are not considered as voicing a positive opinion within the report, nor was there even a show of hands of support taken at the meeting as an observational meter. No questionnaires were available from the representative at the meeting. We were told to go to the post office to receive one. The school district itself made efforts to make copies before the meeting adjourned.

If this proposal is implemented, delivery and retail services will be provided by the Italy Post Office, an EAS-16 level office. Window service hours at the Italy Post Office are from : 8:00 16:00, Monday through Friday, and 09:00 10:00 on Saturday. There are 61 post office boxes available.

The following concerns were expressed on the returned questionnaires, at the community meeting, from customer letters, on the petition, and from the congressional inquiry:

Concerns expressed by the community and responses in the Summary report

1. **Citizen Concern:** Customers concerned about having to travel to another post office for service.

Response from USPS: Services provided at the Post Office will be available from the carrier, and customers will not have to travel to another Post Office for service. Most transactions do not require meeting the carrier at the mailbox. Stamps by Mail and Money Order Application forms are available for customer convenience. Stamps are also available at many stores and gas stations where customers may already shop, online at usps.com or by calling 1-800-STAMP-24

Save the Avalon Tx Post Office Response:

From this response, transactions will be delayed. There will be no immediate customer service in many cases. Online services imply that customers have access to computers and internet service. Both of those expenses are not feasible for many customers, especially on fixed income. Avalon ISD has a student population of 70% on the free or reduced breakfast/lunch program which is reflective of the community. Unfortunately, this would shift the expense from the USPS to the citizens of Avalon and other patrons of the Avalon Post Office. In effect, the "savings" proposed by this report from the closure of the post office, in addition to logistics, shifts that financial burden to the customer. Until the vision of an expanded broadband internet service across rural America comes to fruition, this will always be problematic. Again, there will never be immediate postal needs service to the community. This proposed alternate plan negatively affects Avalon's most vulnerable.

2. **Concern:** Customers were concerned about mail security.

Response from USPS: Customers may place a lock on their mailboxes. This mailbox must have a slot large enough to accommodate the customer's normal daily mail volume. The Postal Service does not open mailboxes which are locked and does not accept keys for this purpose.

Save the Avalon Tx Post Office Response:

For customers needing additional monetary transactions, this will require the purchase of an additional, possibly more expensive, type of mailbox or the modification of their current mailbox if someone is found to alter metal boxes. Additionally, a locked box invites the question of "Why are they locking their box now?" Nefarious individuals will look at this as an invitation to steal the box off the pole. This is a rather naïve consideration given that this is a very rural community and destruction to mailboxes has happened in the past, although those incidents may not show up on county police records. Those incidents have not been taken as high level priority in the past so citizens have rather learned to just replace boxes time and again. While crime is not rampant in this area, this USPS response is unrealistic and simplistic without much consideration of the customer.

3. Concern: Customers were concerned about obtaining services from the carrier

Response from USPS: The rural carrier provides all the services that are available at the Post Office with the exception of PO Box service and bulk mail acceptance. This includes stamp sales, package pick up, special services and money order sales.

Save the Avalon Tx Post Office Response:

This response implies that Avalon residents are at home to meet the mail carrier or are able to go out if handicapped or if inclement weather is occurring. Package pick-up requires prepaid postage. This will also require the carrier to have a rather large assortment of cash on hand which in itself is not safe as it will be known that Avalon carriers, out in the countryside, have cash in the vehicle. This is a rather troubling solution.

4. Concern: Customers were concerned about senior citizens.

Response from USPS: Carrier service is beneficial to many senior citizens and those who face special challenges because the carrier can provide delivery and retail services to roadside mailboxes or Centralized Box Units. Customers do not have to make a special trip to the Post Office for service. Special provisions are made for hardship cases or special customer needs. To request an exception for hardship delivery, customers may contact the administrative postmaster for more information.

Save the Avalon Tx Post Office Response:

According to this response, these services are available now to our senior citizens and the physically challenged. There seems to be no additional services that are not available with the post office open and addresses only the extreme end of "senior citizen."

A question that was asked by citizens, senior and younger, at the meeting on June 1 concerned medication received through the mail. Many receive medication that cannot be exposed to extreme temperatures such as when left in an exposed box or CBU in 100 degree heat. This has been confirmed to us by a pharmacist. Extreme temps can modify the effectiveness or the composition of medications. They want their medicine secure and not exposed to adverse conditions. Not all senior citizens are at home when the carrier comes by as many are still able-bodied, working individuals.

5. Concern: Customer expressed a concern about irregular hours that the rural route serves the community.

Response from USPS: I responded to the customers that all carriers have a schedule and are required to leave on time and that management must ensure compliance.

Save the Avalon Tx Post Office Response:

There is no assurance that carriers leave on time. It is difficult to monitor adherence to a schedule from an outside management center. If the carrier will be having to now conduct post office business on the route, there is always the possibility of time delays while having to serve other customers. Many of our roads become impassable or with difficult conditions from rain storms and that can also cause delays. The conditions of our county roads, including severe potholes, will also add to the expense of the upkeep of the postal vehicle from tire replacement or front end alignment. The "savings" indicated in this report would again be diminished as a result of the wear and tear to postal vehicles. This is evident in the school district bus repair expenses from the local school routes.

Time delays do occur and in many instances cannot be avoided. As an example, the representative arrived 15-20 minutes late to the June 1 meeting.

6. Customer expressed a concern about package delivery and pickup.

Response from USPS: The customer expressed a concern about package delivery and pickup. Rural carriers will deliver packages that fit in your rural mail box, if the package does not fit in the mail box, the carrier will deliver the package up to ½ mile off of the line of travel, at a designated place, such as on your porch or under a carport.

Save the Avalon Tx Post Office Response:

Living in a rural environment, leaving items out on a porch or in a carport is not an acceptable practice if one is gone during the day. Packages should also not be left in such places for anyone to pick up if they are seen as one is driving by. Likewise, those porches or carports, although within a ½ mile, are behind locked gates that lead up to the house and there would be no way for the carrier to deliver the package. Would the customer be forced to drive 14 miles round trip to Italy to pick up that package? What if the package, which is now delivered to and picked up from the location, now, is too big or heavy to place in the carrier's vehicle? We have had veterans in Iraq send large packages home in anticipation of their return months later. The families have come to the post office to pick up those boxes/packages because of their size or weight. Again, that would be forcing an unnecessary 14 mile round trip.

7. Customer expressed a concern about their 911 address.

Response from USPS: The customer expressed a concern about your 911 address. 911 addresses are generally given by the county's 911 coordinator. The Postal Service does not establish 911 addresses. Any questions concerning your 911 address should be directed to the county's 911 coordinator.

Save the Avalon Tx Post Office Response:

This is not a concern. However, there was a concern about the community losing its zip code. Those at the meeting felt this would be comparative to losing a piece of its identity as Avalon, Tx. The community was assured that this would not happen. Avalon, Texas would remain 76623.

8. Customers asked why their post office was being discontinued while others were retained.

Response from USPS: The customer asked why the suspended post office was being discontinued while others were retained. Post offices are reviewed on a case-by-case basis. When there is a vacancy in a small office, it is customary to conduct a study of the business activity and investigate the feasibility of providing service by alternate means.

Save the Avalon Tx Post Office Response:

Concern was expressed at the meeting of the lack of effort to replace the postmaster who retired in 2010 or that applications to work at the post office in Avalon were never acknowledged. To our knowledge, there was no visible public notice of a vacancy in Avalon. There are other post offices in smaller communities in Ellis, Navarro or Hunt counties that are not being investigated for closure. While we understand that is a case-by-case basis, some of the procedures in this process appear to be done from a predetermined basis of closure and some responses canned and not indicative of any thorough investigation relating to our community's needs. The impression that we were left with was that the public hearing was simply procedural and part of a designed protocol leading to closure. Despite the claim that the meeting was only "fact-finding", it appears that the intent was simply to follow legal protocol and that the decision had already been made.

9. Customers expressed a concern about leaving money in the mailbox.

Response from USPS: The customer also expressed a concern about leaving money in the mailbox. A questionnaire was sent to the postal inspection service concerning mail theft and vandalism in the suspended Post Office area. Their records indicate that there has not been any report of mail theft or vandalism in the area. However, customers may place a note in their mailboxes instructing the carrier to sound their horn when they arrive, in order to transact financial business.

Save the Avalon Tx Post Office Response:

Again, this is assuming that customers are at home or will hear the horn when sounded. This response is presumptuous. Avalon is not a community of retirees who stay at home on a daily basis. As stated before, when vandalism has been reported to the county, it has received low priority and it is unknown if those incidents were even reported to the postal inspection service.

Some advantages of the proposal are:

1. The rural or contract delivery carrier may provide retail services, alleviating the need to go to the post office. Stamps by Mail order forms are provided for customer convenience.
2. Customers opting for carrier service will have 24-hour access to their mail.
3. Savings for the Postal Service contribute in the long run to stable postage rates and savings for customers.
4. CBU's can offer the security of individually locked mail compartments. Parcel lockers provide convenient parcel delivery for customers.
5. Customers opting for carrier service will not have to pay post office box fees.
6. Saves time and energy for customers who drive to the post office to pick up mail.

Save the Avalon Tx Post Office Response:

1. *The rural or contract delivery carrier service has been addressed in previous sections.*
2. *Avalon customers NOW have 24 hour access to their mail.*
3. *Until major changes are made across the country, the minimal savings closing the Avalon Post Office will basically not affect postal rates in our area. This is a national consideration – not one dependent on the closing of a small rural post office.*
4. *This report states that there will be NO parcel lockers built – only CBU's – which contradicts this point.*
5. *By this statement, we may assume the CBU's will be free of charge which will be a loss of revenue for the USPS, again contradicting the major selling point of this report to the USPS decision makers.*
6. *This is an unsubstantiated comment. Most people in this rural town see the post office as part of their daily life, a place for fellowship and a source of pride for the*

community. This comment is rather out-of-touch with rural America and the life of those who live here.

Some disadvantages of the proposal are:

1. The loss of a retail outlet and a postmaster position in the community. Retail services may be provided by the rural or contract delivery carrier.
2. Meeting the rural or contract delivery carrier at the box to transact business. However, it is not necessary to be present to conduct most Postal Service transactions.
3. A change in the mailing addresses. The community name will continue to be used in the new address. A carrier route address will be assigned.

Save the Avalon Tx Post Office Response:

The disadvantages listed above are true disadvantages. The "solution" following each one is overly simplistic and does not take into consideration the human and the intangibility of what it truly means for a community to lose a post office that has been a steadfast landmark for decades. The loss of this final connectivity to the federal government tends more toward feelings of abandonment rather than a simple closure to save the USPS about \$20,000.00. There was no discussion at the meeting on any alternative plan to reduce costs other than a complete closure. There were no possible solutions presented other than more revenue/customer traffic needed. Modified schedules or times and days of opening was not presented. Total closure seemed to be the ultimate solution at the "informational" meeting.

1. *Yes, the loss of the retail outlet and a postmaster will be a great loss. Nothing can substitute for the human interaction when doing business at a place of business. If rural or contract carriers are to keep to the delivery schedule, little time will be available for the customer interaction that one can receive at the post office now. It may be intangible, but it is important and it is vital to some residents who make this a part of their daily routine.*
2. *Although we are rural, and many of those who attended the meeting were senior citizens or retirees, it cannot be assumed that Avalon customers are homebound. Avalon ISD has a majority representation of those who are not at home on a daily basis and who do not wish to leave money in their mailboxes to complete a transaction such as stamps or money orders. Again, where does the interaction with a postal employee for customer service come in to play with this plan.*

3. *Change of address was not a major issue, although some customers do feel the loss of a PO box they have had since the office opened. We were assured that Avalon would not lose its zip code of 76623, easing that concern, and the customer opinion about keeping our zip code was stated vehemently at the meeting.*
4. *The cost of fuel to customers. With many of our residents on fixed incomes and the 70% Free or Reduced Lunch Program population of the school district, the expense to the customer to travel to Italy for simple postal needs that are met now at the local post office is concerning.*
5. *The cost of fuel to the USPS. Does not increasing the route of the carrier increase the cost of fuel for the vehicle(s), in addition to the maintenance of the vehicle? Is there a projection or cost analysis of the increased postal route delivery in regards to fuel costs and the cost of vehicle maintenance and tires?*
6. *If customers chose not to have their mail left in the CBUs, adding the additional route customers will have an effect on the delivery time of the mail carrier. Will additional personnel be needed? Is there an analysis of the effect of an increased number of route customers?*
7. *If there is not a charge for the CBUs to the customer, and there are additional costs to an increased mail route, how does this affect the projected "savings" outlined in this report?*
8. *The school district receives mail daily in carrier bins because of the large amount of daily mail received by employees. It is stated that parcel lockers will not be built for large packages or, in this case, large amounts of mail. The cost of fuel and personnel time to have to go to Italy to pick-up daily mail is prohibitive. If the carrier will deliver directly to the school, personnel cannot be assigned to sit and wait on the delivery each day. Having to get out of the postal vehicle will be time consuming for the carrier and adds a layer of inefficiency to this plan.*

Taking all available information into consideration, the Postal Service concludes this proposal will provide a maximum degree of effective and regular postal services to the community.

Save the Avalon Tx Post Office Response:

This statement indicates that the meeting held on June 1 was NOT only an informational or fact-finding meeting. This conclusion seems to be based on comments made at that meeting. Statements within this report indicate that this "study" was not conducted with consideration to the community – only to the rather callous viewpoint as to the advantages of the USPS. As stated at the beginning of the meeting by the representative, "I didn't even know there was a school district here" is indicative of the type of in-depth analysis provided to the effects of a possible closure on the community of Avalon. The only analysis provided is the cost of the postmaster salary and benefits and the rental of the building. No analysis was provided that would measure the extent of additional costs that this plan will incur.

Seeing this statement within this report was actually rather alarming as the meeting was stated to be only informational and fact-finding and not one upon which a decision would be made as the future of the Avalon Post Office.

II. EFFECT ON COMMUNITY

Avalon is an unincorporated community located in Ellis County. The community is administered politically by Ellis County Waxahachie. Police protection is provided by the Ellis County Waxahachie. Fire protection is provided by the Avalon Volunteer Fire Dept. The community is comprised of Small Businesses, farmers, retirees, and those who commute to work at nearby communities and work in local businesses.

Save the Avalon Tx Post Office Response:

Avalon, Tx also includes a school district of 321 students and 50 employees across the street from the post office. Avalon Independent School District makes exclusive use of the Avalon Post Office on a daily basis. The school's postage meter is set to credit the Avalon Post Office and the USPS representative came to the school central office after the June 1 meeting to verify the meter receipt. There are two entities with postage meters that are not being credited to the Avalon Post Office. That was made clear to the USPS representative yet, that does not show in the findings.

Business and organizations include: First Baptist Church, Kang Mung Church, St. John Baptist, Avalon ISD, La Estralilita Restaurant, Area Wide Plumbing, CSC Disposal, CIE Unlimited, Just Fish, Avalon Co-Op Gin, BR Furguson, Inc., Soap Goddess, Phillip Services, JW Hayes Trucking, Patty's

Perfect Pocket, Sadie's Bookshelf, Bob's Fence, ESD #8, Avalon Volunteer Fire Department. Residents may travel to nearby communities for other supplies and services.

Save the Avalon Tx Post Office Response:

An automotive and full service business is also in the planning process for opening in Avalon in the near future. The owner has expressed concern about the post office closure and how that would affect the business's delivery and order needs. Traveling to Italy defeats their business plan in terms of fuel and postal expenses and their ultimate financial success. Patty's Perfect Pocket, for instance, recently opened an online sales site with the Avalon Post Office as its postal point.

The possible closure will affect the decision of other prospective businesses in the town.

Nonpostal services provided at the Avalon Post Office will be available at the Italy Post Office. Government forms normally provided by the Post Office will also be available at the Italy Post Office or by contacting your local government agency.

The following nonpostal concerns were expressed on the returned questionnaires, at the community meeting, on the petition, and on the congressional inquiry:

1. Concern: Customer expressed a concern about the loss of the community bulletin board at the Post Office.

Response from the USPS: Many retail outlets and grocery stores are now displaying a public bulletin board in which items can be posted for sale, and/or lost and found items can be posted, and a variety of other information. The administrative Post Office may have a public bulletin board which may be used to post the same information.

Save the Avalon Tx Post Office Response:

The case-by-case study would have shown that there are no retail outlets or grocery stores in Avalon, only a small restaurant cafe. The post office is the only place in Avalon to post community notices where residents know that such information can be found. The closest retail store is seven miles away in Italy (as is the proposed administrative post office) and such a bulletin board would be futile to place there to provide communications for Avalon residents. Community notices should be posted within the community and the post office has served as the cornerstone of this community for decades. It also serves as the gathering place where residents have an opportunity to exchange greetings and fellowship. Closure of this central location promotes isolation which is counter to the idea of promoting economic prosperity to rural America. Closure of this post office is counter to the fundamental idea proposed by the White House Rural Council.

2. Concern: Customers were concerned about growth in the community.

Response from the USPS: The growth of a community does not depend on the location of a Post Office. Based on information obtained by the Postal Service, it was determined that there has been minimal growth in the area in recent years. Carrier service will be able to accommodate future growth.

Save the Avalon Tx Post Office Response:

One fact overlooked in this statement is the effect of the growth of the local school district in the last 7 years. From an enrollment of 205 to a current 321, an increase of 36% is not insignificant to the study. Avalon ISD is categorized as Non-Metropolitan Fast Growing by the Texas Education Agency. Definition of Non-Metropolitan: Fast Growing (30 districts). A district is classified as non-metropolitan: fast growing if: (a) it does not meet the criteria for classification in any of the previous subcategories; (b) it has an enrollment of at least 300 students; and (c) its enrollment has increased by at least 20 percent over the past five years.

The summary finding notes that "growth is not dependent on the location of a post office." This statement is not factually based and the report provides no supporting data. It is a personal opinion that is not factually based. Historically, cities and towns have grown out of proximity to water, rail roads, and growth of interstates and highways. To assume that growth is not related to human services is misguided and short-sighted. Growth is related to the ability of a community to provide services to its citizens.

3. No concern.

Based on the information obtained in the course of this discontinuance study, the Postal Service concludes this proposal will not adversely affect the community.

Save the Avalon Tx Post Office Response:

We are under the opinion that this conclusion is not merited and is without sufficient information and study. If the discontinuance study is based on strictly an economic basis then that should be have been the focus of the meeting rather than conduct a meeting under the guise of fact-finding simply for the sake of fulfilling the legal requirement of a community hearing. This should have been stated rather than presenting a charade of a community hearing with hopes of keeping our post office.

III. EFFECT ON EMPLOYEES

The postmaster retired on January 01, 2010. The noncareer postmaster relief (PMR) may be separated from the Postal Service. No other Postal Service employee will be adversely affected.

IV. ECONOMIC SAVINGS

The Postal Service estimates an annual savings of \$49, 679 with a breakdown as follows:

Postmaster Salary (EAS-11, No COLA)	\$ 33, 168
Fringe Benefits @ 33.5%	\$ 11, 111
Annual Lease Costs	\$ 5, 400
Total Annual Costs	\$ 49, 679
Less Annual Cost of Replacement Service	<u>- 0</u>
Total Annual Savings	<u>\$ 49, 679</u>

A one-time expense of \$ 7969 will be incurred for installation of CBUs and 0 parcel locker(s).

These figures only account for the expense related to personnel and leases. It however does not include the revenue generated, thus the savings is inaccurate. It does not also include the additional ancillary costs that will be incurred with additional mileage added by residents that will now want their mail delivered to their rural homes rather than CBU's. The savings will be more along the lines of \$20,000, but at what real human service cost to our citizens.

V. OTHER FACTORS

The Postal Service has identified no other factors for consideration.

VI. SUMMARY

The Postal Service is proposing to close the Avalon, TX Post Office and provide delivery and retail services by rural route service under the administrative responsibility of the Italy Post Office, located six miles away. Service may be provided to cluster box units (CBUs).

The postmaster retired on January 01, 2010. If the office has a noncareer PMR(s), they may be separated from the Postal Service; however, attempts will be made to reassign the employee(s) to a nearby facility. No other employee(s) will be adversely affected. Post office workload has declined. Effective and regular service will continue to be provided by rural route service.

The Avalon Post Office provided delivery and retail service to 165 PO Box or general delivery customers and no delivery route customers. The daily retail window transactions averaged 17. There are no permit mailers or postage meter customers.

There will no longer be a retail outlet in the community. However, delivery and retail services may be available from a rural or contract delivery carrier, which could alleviate the need to travel to a post office for service. The Postal Service will save an estimated \$49,679 annually. A disadvantage to some may be in meeting the rural or contract delivery carrier to transact business. However, it is not necessary to be present to conduct most Postal Service transactions with a rural or contract delivery carrier.

Taking all available information into consideration, the Postal Service has determined that the advantages outweigh the disadvantages and this proposal is warranted.

Save the Avalon Tx Post Office Response:

Points within the above paragraphs have been outlined by the Save the Avalon Tx Post Office throughout this document.

During the meeting the public was lead to believe that the intent of the meeting was fact-finding. At no point during the meeting was it communicated that the meeting would result in a recommendation for or against closure. The focus of the meeting was for gathering of information and that the decision would be made by United States Postal Service upper management.

We are open to dialogue concerning how we, as a community, can save our local post office. We hope that, collaboratively, we and the USPS could find alternative solutions to

keeping the post office in Avalon, such as reducing hours or days of operation in order to mitigate some of those expenses and achieve greater postal efficiency without having to close such an important human service.

VII. NOTICES

- A. Support Materials. Copies of all materials upon which this proposal is based are available for public inspection at the Avalon Post Office and Italy Post Office during normal office hours.
- B. This is a proposal. It is not a final determination to close this post office. If a final determination is made to close this post office, after public comments on this proposal are received and taken into account, a notice of that final determination will be posted in this office.

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 posting of the final determination.

Signed 06/20/2011 by:
Lou Klegin
Manager, Post Office Operations

(Original report received and available at the Avalon Post Office June 20, 2011)

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RESPONSIVENESS TO COMMUNITY POSTAL NEEDS