

December 19, 2011

Secretary of the Postal Regulatory Commission
Postal Regulatory Commission
901 New York Avenue, NW, Suite 200
Washington D. C. 20268-001

RE: This is an appeal and petition for review of the Final Determination to Close the Jonesville, Texas Post Office 75659 and Establish Service by Rural Route Service (Docket Number 136851-75659) which was posted on December 7, 2011. This serves as a formal request that the United States Postal Service Final Determination be set aside and remanded. Furthermore, this serves as a formal motion to Suspend the Closure of Jonesville Post Office 75659 until the Postal Regulatory Commission has reviewed and made a decision relative to the appeal and claims set forth in documentation to be presented by Petitioners.

Secretary and Members of the Postal Regulatory Commission,

I hereby respectfully request an appeal and submit petition for review of the Final Determination to Close the Jonesville, Texas 75659 Post Office and Establish Service by Rural Route Service (Docket Number 1368541-75659). The determination to close the Jonesville Post Office is not substantiated by complete evidence or documentation in the records submitted by the United States Postal Service. USPS District officials did not follow all procedures within established guidelines set forth by the United States Postal Service in Handbook PO - 101, Postal Service - Operated Retail Facilities Discontinuance Guide which was revised in July of 2011. Final Determination judgment was based on inaccurate and incomplete data and was therefore representative of clear errors of judgment and action not based on consideration of relevant factors pertaining to the community and postal customers. Closure will seriously impact the community, businesses and customers of Jonesville Post Office, and the postal employee. Rural delivery service will not provide "maximum degree of effective and regular postal services" to our unincorporated small rural community as provided by Title 39 U. S. Code 404 (d) (2) (A), nor will rural delivery service provide the same degree of service, safety, and security for mail delivery and retrieval as compared to mail deposited in locked post office boxes inside Jonesville Post Office. Driving to another community for postal service would greatly impact businesses in Jonesville by removing workers and employees from their work locations for achieving postal service elsewhere. Driving to another community post office for service would greatly impact and inconvenience residents. Whereas residents and businesses currently retrieve mail on a daily basis, added distance for retrieval could limit access. Jonesville Post Office has demonstrated a significant increase in revenue over the past few years and an increase in the number of post office box rentals. Workload at Jonesville Post Office has been documented by the Dallas District to be 2.2 (See Reference # 1 Final Determination, USPS Item 35, p. 4, Response 24). Closing a productive small rural post office does not make logistical sense when the United States Postal Service is in financial demise. The documented significant revenue increase over the past few years must certainly be

desirable and considered evidence of increasing customer demand for postal service in Jonesville.

Commissioners, please review letters sent to USPS and note the USPS official responses to those letters (See Reference #5, Reference #12, Reference #14, and Reference #15). For ease of review, a letter sent is followed by the response received unless there was no response received. Perusing the many letters sent to USPS officials in area, district, southwest area operations, and national offices should reveal sincere attempts to retrieve answers, correct misinformation filed by USPS, and provide viable, helpful, and immediate solutions to the financial status of Jonesville Post Office 75659. Had USPS provided appropriate and direct responses, the number of letters sent to USPS would have been fewer in number.

Jonesville customers bent over backwards trying to help USPS achieve complete and accurate descriptions of the community, its businesses, its residents, its organizations, and its needs for the post office in Jonesville. Considerable effort was made by Friends of Jonesville Post Office to gather information from postal patrons, rural residents, walk-in customers, and Spanish-speaking residents. Much information was submitted to the district discontinuance coordinator (See Reference #12, 12.37, Final Letter to District). With respect to the USPS officials given the task to gather and evaluate submissions to be utilized in the final decision, those officials most likely did the best they could within their capability, education, and experience. However, fact finding and evaluation in discontinuance proceedings are matters which warrant the highest degree of capability, education, and experience. Improper documentation, disregard of submissions, overlooking submissions, misplacement of submissions, USPS forwarding of important documentation to the wrong officials, or perhaps unqualified personnel filling in for a qualified official could severely impact results of the proceedings. Advanced research knowledge and skill is not something inherent in the average person. While experience can contribute to performance, clearly defined knowledge and skill that adheres to acceptable research standards should be the norm in discontinuance related research, documentation, and evaluation. Therefore, the research attributes of district officials given the task to gather facts, interpret submissions, evaluate data, and make presentations toward final determination judgment seemed below the standards necessary in this discontinuance proceeding.

Jonesville is an unincorporated rural community in Harrison County, The Jonesville Post Office serves as the one and only visible government related entity in the community. While we are governed by Harrison County, we do not have daily government presence in our community such as a police department or a fire department. We receive those services if and when we call for assistance from the Harrison County Sheriff's Department or the neighboring community's Fire Department. Unlike most cities and towns, Jonesville extends for miles to the north, south, east, and west of the post office and along rural roadways, some of which are remote. Jonesville

Post Office serves customers who live near the post office and customers who live in the outer lying areas geographically well known as Jonesville for over 164 years. Jonesville Post Office will be celebrating its 165th anniversary in 2012 if service is continued (See Reference # 2).

The official notification letter and questionnaire dated August 17, 2011 from Frank Richards, Manager of Post Office Operations, stated that our post office was “being studied due to declining office workload” and that the “revenue and/or the volume this office has been in a steady decline over the past several years.” (See Reference # 3, second paragraph). No mention was made of postmaster vacancy and insufficient customer demand in that letter. No mention was made relative to loss of Zip Code. No mention was made relative to additional questionnaires being made available or provided to additional members of households with rented post office boxes or to walk-in customers. No notification letters were sent to other residents of Jonesville who do not rent post office boxes. It is important to note that questionnaires were not provided to customers on August 17th, but were put into post office boxes on varying days from August 20th through August 22nd for the district did not send enough for each post office box. The Proposal to Close Jonesville Post Office (See Reference #4, 4.2 From Proposal to Close) contained a letter from Frank Richards to Victor Benavides, District Manager, in which elimination of Zip Code was advocated and in which insufficient customer demand and office workload were cited as “rationale for this study.” The Proposal to Close was first available to the public for review on August 24th for the district faxed it to the PMR at the close of office hours on the 23rd. The document was under lock and key until August 24th. No indication was made that postmaster vacancy was another rationale for consideration for closure. That rationale was first introduced in district responses to customer questionnaire submissions. The postmaster retired in 2008, and a competent PMR has been providing exemplary service to Jonesville postal patrons. Another important note is that in addition to full opposition to discontinuance at the community meeting, 561 petition signatures opposed the discontinuance, and more than 367 letters of opposition were sent to the district. Some letters were not included in the district’s Final Determination document and some letters received no response (See Reference #5).

Throughout the discontinuance process, residents submitted suggestions to Dallas District officials which would immediately benefit the United States Postal Service by reducing costs of operation, which would improve the acknowledged 2.2 workload, and which would significantly contribute to the self-sustainability of Jonesville Post Office and thereby help USPS. Suggestions included reducing the hours of operation, increasing the post office box rental fees, eliminating Saturday window service, and accepting a fifty percent lease reduction as offered by the Lessor. Each suggestion would certainly help the United States Postal Service and would maintain viable postal service in Jonesville. District Officials did not make immediate changes in the hours of operation which would instantly help reduce costs and improve workload. On August 12th, the Lessor called the Dallas District real estate office and offered to reduce the

lease by fifty percent to help reduce postal service costs. The lessor sent a follow-up offer to that office (See Reference #6.1). The offer was not initially accepted by USPS, and Linda J. Welch, Vice President of Southwest District Operations, offered an explanation that “because this facility is identified on the Post Office discontinuance study list, until all the studies have been completed we are very careful not to enter into a new lease contract.” (See Reference #6.2, page 2, 2nd paragraph.) On September 12th, the real estate office initiated a renegotiated lease in spite of knowledge of the statement by Linda J. Welch. The Lessor executed the necessary documents to assist the United States Postal Service in reducing operating costs. The Dallas District did so for its own personal benefit rather than for purposes of continuation of a small rural post office which could be self-sustaining with such action. The lease contract period is not complete until 2015. (See Full Reference #6). The final determination to close the Jonesville Post Office is disrespectful of good faith efforts by the Lessor to help the United States Postal Service keep a post office open. USPS renegotiated the lease for reducing contractual costs after the proposed discontinuance rather than for improving financial status of the post office in Jonesville. Residents perceived that action as “kicking a wounded dog while down” or “sticking the knife in and twisting it.”

District officials did not gather and record accurate information about the Jonesville community, its residents, its businesses, its organizations, or its churches prior to executing the Proposal to Close the Jonesville Post Office available for public review on August 24, 2011 (See Reference #4, 4.5 - 4.6, From Proposal to Close and References in #8). The district failed to properly research facts about Jonesville. The Manager of Area Operations and District Manager made decisions to study our post office for discontinuance without considering current facts relative to Jonesville. Our community was described as having only one business which was not and is not true. Our community was described as being comprised of 50% retirees and 50% commuters which was not and is not true. District officials denied the existence of organizations and churches which did and do exist. Multiple letters containing more accurate information were sent to the District. Residents challenged the content of the proposal at the community meeting which was held on August 27, 2011. The Manager of Post Office Operations, Frank Richards, and the District Discontinuance Coordinator, Allison Rizan, conducted the community meeting. Throughout the 60 day comment period which ended October 24, 2011, residents continued to submit documentation of other businesses, organizations, and churches, historical places, historical events tied to Jonesville, annual public events held in Jonesville which attract many tourists and visitors, and the number of post office box holders which at the community meeting was reported to be 123 rather than the 111 reported in the proposal and the Final Determination. There were 127 post office boxes patrons at the end of the comment period and yet, once again, the district reported only 111 in the Final Determination. How can USPS not know the real number of post office boxes rented by customers? Did USPS officials even try to verify that number? (See Reference #4).

In the Final Determination, the district presented a different description of Jonesville's population, but even that is questionable because their listing (Reference #1, USPS Item 35, page 31, Effect on Community) states that "10% are farmers, 3% are ranchers, 40% are Oil and Gas industry workers, 25% retirees, 2% students, 10 % small businesses, 2% students, 10% employed and those who commute to work....." Where did those figures originate? Are farmers and ranchers not employed? What does the 10% employed represent when there are other employment categories listed? What does the 10% small businesses represent? Are those latter two submissions legitimate population categories? The district did not document their reported population statistics. It seems to be a very irregular description although far better than their previous fabrication of 50% retiree and 50% commuters. At some other point in the process, the district made a statement which referred to Jonesville's population as declining, but 2010 Census data for unincorporated rural communities will not be available until late in 2012 or even later (See Reference #7, 7.1-7.2). If population in Jonesville is truly declining then why has post office revenue continued to increase in such an economic depressing time for the country? Business growth seems obvious as well since Texas Gas Gathering and Transmission (TGGT) opened its new office in Jonesville in August. Final Determination was to be based on the information and content in the district's documents. Faulty documentation warrants that the decision for closure should be revoked, removed, disqualified, dismissed, or in this appeal, remanded. Residents have become very resentful of the disrespect shown to our good faith submissions to correct official records. The Final Determination does not list all businesses, organizations, and churches that are situated in Jonesville. EXCO, TGGT, Vaughan Properties, and other businesses and organizations were not included. Why? Allison Rizan stated that she "confirmed which businesses needed to be added to the proposal and this was completed before it was submitted" (See #12, 12.39), but Ms. Green (PMR) does not live in Jonesville and does not have full knowledge as a resident would have about businesses in the community. November letters from Debora Ebera and Allison Rizan stated that twelve businesses were added to the official record, but what happened to the other businesses? Why were businesses and organizations left off of the official record? (See Reference #1, USPS Item 35, p.31, Effect on Community; see Reference #8, Community Description Documentation Letters; See Reference #12, 12.39 Letter from Allison Rizan; and Reference #15, 15.8 Letter from EXCO Operating).

The District Discontinuance Coordinator provided one questionnaire per post office box. Only 111 questionnaires were initially sent to Jonesville's PMR for distribution to the individual post office boxes, but the postal clerk requested more to accommodate the other boxes. Twelve additional questionnaires and notification letters were distributed to the other post office boxes by August 22, 2011. No walk-in customers or residents living in Jonesville who opted to receive delivery by rural carrier from other post offices were sent notification letters and questionnaires to complete. Walk-in customers and rural delivery customers in Jonesville seek postal services other than delivery of mail from our Jonesville post office because it is closer to their homes and/or because they drive by the Jonesville Post Office on a regular basis. Those customers were not informed that they could submit questionnaires in defense of

the local post office. While the Final Determination (Reference #1, NBR 35, page 2) states that "Questionnaires were also available over the counter for retail customers at the Jonesville Post Office," how were retail customers and rural residents supposed to know about that opportunity if they did not receive notification from the district? Furthermore, post office box renters were not informed that they could submit additional questionnaires for other household members who receive post office box mail. Failure to seek input from the community at large including retail customers who seek service on a regular basis but who do not rent a box created a situation in which the Jonesville community was not completely surveyed. District analysis of questionnaire responses could not fully or truthfully catalog responses from the total community of postal patrons. The deadline for submitting the questionnaire responses was September 6, 2011. Assertions by the district that more questionnaires were available does not suffice when customers had no knowledge of the availability of questionnaires or the opportunity to complete such questionnaires. Please note that one page in the Final Determination (See Reference #9, 9.10) represents Allison Rizan's memo which states

"I have enclosed additional copies of the questionnaires for any retail or other customer who wishes to complete one. Please furnish these questionnaires to retail customers upon request. All completed forms should be forwarded to my office by 08/27/2011 for further review."

That memo supposedly was sent to the OIC/POSTMASTER, but the requested submission date for return of questionnaire responses varies from the date indicated in the notification letter (See Reference #3). The return date for Jonesville resident questionnaires was specified as "no later than 09/06/2011." Why is there yet another discrepancy in documentation? If additional questionnaires were available, why was the public not informed. There were comment forms available, but not official questionnaires.

Concerns about the questions on the questionnaire were submitted to the District with my personal questionnaire responses, and in letters to Vice President of Southwest Area Operations and Postmaster General, Patrick Donahoe. (See Reference #10, 10.1, and 10.2). Evaluation expertise seemed lacking in the district. Questionnaires should have been designed to seek accurate input rather than designed to render skewed responses to support the District's intentions to close the post office. Surveys and questionnaires should have been designed to obtain more accurate information about the community rather than designed to lure self-condemning statements. The USPS questionnaires sent to Jonesville residents could best be characterized as biased instruments and therefore conducive to invalid interpretation, evaluation, and usefulness in a matter as serious as closure of a United States Post Office in a rural area.

Conditions at the community meeting were less than desirable or healthy if the district truly wanted to seek input from concerned postal patrons and potentially impacted residents and business constituents. On August 15, 2011, I called Allison Rizan to try to reschedule the community meeting for a future date and time when temperatures were not so extreme and when more residents could attend. She had

contacted my sister, Marty Vaughan, about hosting the meeting in T. C. Lindsey & Company, but my sister explained that our store was not air conditioned. In my phone conversation with Allison Rizan on August 15th, Allison stated that the date, time, and place for the community meeting had been set and could not be rescheduled. She set the time for 2:30 pm in spite of recorded temperatures of 108 degrees the week of our conversation. She set the meeting place at the Jonesville Post Office which has a very small lobby. The community meeting was attended by over 70 residents and customers. There was inadequate space and only two or three chairs available for attendees. The standing room only lobby was very crowded, and not all attendees could fit inside the small space. There were fifteen or more residents who had to stand outside in the 102-103 heat. One resident became ill due to heat stress and had to leave. Attendees outside were not privileged to hear the discussions and presentations. Failure to provide opportunity for full participation does not constitute a sincere attempt by the district to inform residents and to seek verbal input from residents. USPS did not issue a public service announce through local news media about the Jonesville community meeting until the day after the meeting on August 28th. The official USPS release stated that Jonesville's community meeting was previously held on August 27th. (See Reference #11).

In addition to the harsh conditions in which the community meeting was conducted, the district officials provided a Postal Service Customer Community Meeting Analysis (Reference #9, 9.2 - 9.4 from Final Determination Documents). While the District Discontinuance Coordinator's spouse supposedly took notes, the summarized concerns and officials' responses do not seem to correspond with the recording made by an attendee. The full depth of topic discussions was not disclosed in the official document disclosed in the Final Determination. The recording will be submitted for reference through postal mail. Considerable discussion by residents was devoted to the means by which the post office could become self-sustaining. Minimal summary was provided by the district in the final document. Residents asked why such a shallow description appeared in the proposal and why the larger businesses and postal patrons were not included such as EXCO Resources (oil and natural gas exploration and production) and TGGT (Texas Gas Gathering and Transmission, a large regional natural gas pipeline company). Again, neither business is listed in the Final Determination document. Why not? One very accurate part of the summary is that officials did ask residents for comments in writing, and we complied. Jonesville residents submitted more than the 367 letters of concern. As stated previously, some letters were not included in the Final Determination Document for reasons unknown (See Reference #5).

Soon after hearing of the RAOI closure proposal, multiple attempts were made to contact officials regarding preservation of the community name and zip code should the district make final determination to close our Jonesville Post Office. (See Reference #12, Letters to District and Reference #5, Letters Not Included in the Record and No Response Received) It was very difficult to determine who the actual District Manager was and where to send such requests. Requests sent to the Manager of Post Office Operations, Frank Richards, received no response whatsoever. Multiple requests sent

to the District Manager were received by the district but someone other than the district manager received delivery and signed for delivery. I did not receive a reply from the District Manager, but a letter from someone named Brenda Baugh. Who Is Brenda Baugh? Was she qualified to respond to such an important request? Her signature was for someone named Timothy Vierling. Was he the District Manager? An internet research revealed the name of Victor Benavides and his email address. An email inquiry was sent to him. A hard copy was mailed to the District. Our postal clerk could not disclose postal employee personal addresses and understandably so for security reasons. After the Proposal to Close Jonesville Post Office was displayed in the lobby on August 24, 2011, Victor Benavides name was clearly identified as District Manager and the person who signed and submitted the proposal to eliminate our zip code. Frank Richards had submitted the request to Mr. Benavides. Neither Mr. Richards nor Mr. Benavides notified Jonesville customers that our zip code was proposed to be eliminated prior to the 60-day comment period. According to United States Postal Service procedures in their PO-101 Discontinuance Guide (implemented July 2011, pages 45-47, 642.7), "customers should be notified of plans to change Post Office Box numbers and the Zip Code before the 60-day proposal posting." Jonesville residents did not receive that information in the notification letter sent in August by Frank Richards (See Reference #3). While the Zip Code elimination was shown on Mr. Richards' memo to Victor Benavides on August 4, 2011 in the official proposal to close our post office, that information was not put on display until the first day of the 60 day comment period. Furthermore, neither Mr. Richards, Mr. Benavides, or Timothy Vierling responded specifically to my requests to retain Jonesville's Zip Code. It seemed clear that the district did not care if our community lost its Zip Code. Loss of Zip Code can have serious impacts on the community in terms of loss of map identification often dependent and determined by communities with a Zip Code and Post Office. This is especially true in small rural communities which are spread out for miles in all directions such as Jonesville. If Jonesville no longer appears on maps, community identity loss and detriment to businesses could be significant. Why inconvenience so many residents and businesses of Jonesville when there are only a few rural delivery customers who have Zip Code affiliations with rural delivery service providers in neighboring communities? Why would the district impose loss of Zip Code to the majority of residents and to businesses in favor of patronizing only a few rural delivery customers? Would it not make sense to allow Jonesville residents to keep their Zip Code for clarity and simplicity? Confusion already exists due to intervening rural deliveries into our community. As an example, Bellview Road is very near the post office. The first three homes have Jonesville addresses. The next two homes have Waskom rural delivery addresses. The next homes on the road have Jonesville addresses. That roadway is west of the post office. Waskom community is five miles to the east of Jonesville. Why contribute to location confusion when a simple solution exists? Jonesville's Zip Code should not be eliminated regardless of the Final Determination and the outcome of this appeal.

At some point during the feasibility study, the District became aware that they had not provided an accurate and true description of Jonesville community and its residents.

Extensive documentation was provided by residents. (See References #5, #8, #12, #14, #15) The District Discontinuance Coordinator 's responsibility within the PO-101 Discontinuance Guide (Rule 311.1,page 19) clearly states that "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)." Furthermore, the District Discontinuance Coordinator did not make changes to the proposal on display regardless of additional documentation received. As stated in the PO-101 Discontinuance Guide (Rules 361 - 363.1, pages 27- 28) "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." Very significant changes to the record were reported in the Final Determination, but USPS did not provide a revised "Proposal for Discontinuance" about which customers could make comments and/or additional corrections. Rule 363 states "if a significant change is made in the proposal....., repost the revised proposal with an invitation for comments for a new 60-day posting period." The Final Determination shows new information, some of which is still incomplete and incorrect. The Final Determination's variance from the Proposal to Close demonstrates that the District obtained new knowledge and yet failed to update the proposal (See Reference #12, 12.39). Customers served were denied the opportunity to review information added after the comment period and consequently, were denied opportunity to make corrections and submit documentation. Thus, the Final Determination was made without access to truthful and complete information about the community and residents. Denying customers a new proposal review period does not seem fair in such an important proceeding.

The Final Determination does not reflect that the district has been appropriately responsive to multiple customer requests for consideration, inquiries, and repeated statements relative to the need for the post office to remain open. The Final Determination documents which were put on display in the post office December 7, 2011 consist of four very thick notebooks full of letters of concern, questions, and comments relative to the decision to close. Hopefully, content of the official records in those four notebooks will be shared by USPS with commissioners and public representatives. Residents and customers are totally against closure and are not satisfied with the suggested alternative delivery means. Petition signatures submitted to the district verify that fact. District officials responded to some letters of concern, but not all. When responses were sent to customers, the district's statements were often non-specific to the questions asked and, although categorical in nature, did not address concerns, but rather provided standardized responses which supposedly best matched the topic or concern expressed. If a postal customer is concerned enough to submit sincere time consuming letters filled with questions and comments, should that customer receive a legitimate response? Should that customer be given a response totally unrelated to the subject? Some letters to the district did not receive responses to questions or concerns asked. (See Reference #5, Letters that received no response). On November 8th and well after the comment period, I received an envelope from the district which contained fifteen separate District response letters

to various letters I had submitted throughout the discontinuance process. Ten of those district response letters were identical in content and appearance and did not address the concerns expressed nor were my specific letters identified by date in the district's response (See Reference #14.28 - 14.38). Is that an appropriate way for the district to respond when 10 identical letters were not sent to the district? The other five district letter responses did not address stated concerns, but at least the particular letters submitted were referenced. It is very clear that the district just sent response letters extracted from the previously prepared pages for the Final Determination in a last effort to comply with "responding" to all customer requests regardless of whether or not real issues were addressed. The response letters were copies of something signed by Frank Richards. Allison Rizan signed the cover letter, but the cover letter and signature were copies of originals.

In the Final Determination document under Responsiveness to Community Postal Needs, USPS stated "Over the past several years, this office has experience a steady decline in revenue and/or volume" (See Reference #1, Item Number 35, Page 2, 3rd paragraph). The next paragraph states

"FY 07 \$15,783, FY 98 \$17,781, FY 09 \$18,816, FY 10 \$25,120, and Fy 11 \$26,379."

Do those revenue figures support the statement "steady decline in revenue and/ or volume?" The significant increase in revenue is demonstrated. Mail volume has decreased across the country, but a post office which shows increases in revenue in spite of nationwide postal service decline of mail volume, warrants continuation. This is a point clearly put forth to the district officials throughout the feasibility study by numerous residents and customers of the post office in Jonesville. At the community meeting, Pat Vaughan (erroneously referred to as Dr. Vaughan in the Final Determination, Reference #9, 9.11, Concern 21) submitted a financial analysis of the revenue increases (See Reference #9, page 9.12 from Final Determination official record). Pat Vaughan's proposal identified a viable means by which the Jonesville Post Office could become self-sustaining. Why was that proposal not immediately put to action by district officials with authority to adjust hours of operation which in turn would increase workload and the financial status of the Jonesville Post Office? Such adjustments could have been made prior to the Manager of Post Office Operation's decision to propose discontinuance and authorize a feasibility study. Why did the Manager not do his job to improve financial status for USPS? In the Final Determination (Reference #1,USPS Item 35, Page 2, Concern 3), USPS responded to a question about reducing the hours of operation. The noted USPS response was "Hours are determined by the workload at the post office." If workload can be improved by reducing hours of operation, then why was that adjustment not made? If mail volume really has declined and if workload of 2.2 is substandard according to the district, then why did the district not reduce hours of operation which would have immediately produced cost savings?

Another concern addressed by residents at the community meeting and in letters related to the district's failure to include cost/benefit analysis of the suggested alternative delivery services. While the District's financial summary (Reference #9, page 9.7) indicated an annual savings of \$28,525, the summary did not include any acknowledgement of that purported savings as compared with the revenues anticipated. If that figure were to be considered in conjunction with revenues currently produced (\$26,379 in 2011), the savings would only be \$2,246. The district's projected savings would have to be reduced by lost revenues from post office box rentals, a subject which will be addressed further in this appeal letter. Full disclosure of the added expense or cost savings expected from change of service from Jonesville Post Office to rural delivery or to another post office was not provided. Certainly there are costs involved in removing post office boxes from the current facility and costs for making provisions for delivery to another post office or by a rural carrier who could possibly have to deliver mail to 127 additional rural roadside mailboxes. Those costs were not provided, and possibly not addressed. Failure to consider the expenses and costs related to transfer of service is an outright demonstration of inadequate financial consideration.

USPS must consider in its savings projections the following considerations: loss of mail box rental fees per year, continued rental payments through the contract period in 2015, increased need for employees elsewhere to handle additional volume and delivery requirements, additional wages for those responsible for delivery of mail to alternative post offices or to roadside mailboxes, and the additional costs for removal of post office boxes and materials from the current post office. The savings projected in the Final Determination is not a true accounting of cost savings without some consideration afforded to the costs being transferred to another post office and loss of revenue from post office box rental fees. When questioned about full disclosure of costs for the change in delivery, the district responded with statements which referred inquiries to the proper office of USPS which handles Freedom of Information Act requests. I suspect that district officials knew that no information would be provided if a customer exerted the effort to make an official inquiry. I made an official inquiry to both Debora Ebera, District Manager of Consumer Affairs, and to the USPS office in Washington, D. C. in October (See Reference #12, 12.39 - 12.32). Debora Ebera replied that all information that I had requested was protected from disclosure. I received a reply from Myung Kang, Accountant in the Revenue and Field Accounting Office in Washington. That office provided two pages relative to expenses for the Jonesville Post Office. The postal clerk's wages for 2010 matched District figures, but varying lease rental fees were noted. The yearly rental fees prior to the Lessor granting USPS an immediate reduction in September, were \$7,200 per year. The renegotiated lease in September of 2011 afforded the fifty percent reduction to \$3,600 per year. Information relative to revenue was not provided due to being protected by exemption. Why is it that the district can be trusted to reveal revenue information and yet the district cannot reveal expenses related information? Why is it that the the national office can reveal expense information and not revenue related information? One thing is certain, PO-101 Discontinuance Guide (page 21, 321.4) states that "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.” The District did not show accounting for full consideration of all costs for the change in service proposed for customers of Jonesville post office once the post office is closed. What is the estimate for replacement service?

If Jonesville Post Office is closed, USPS will lose a minimum of \$4,538 for the post office box rental fees lost and an additional and considerable amount of rental fees that will have to be reimbursed to Jonesville post office box holders on a prorated basis if service is transferred. The post office box rental fee loss was calculated by counting the number and type of post office boxes currently rented and applying the known cost per box type per number of boxes per year. There were 125 post office box rentals as of December 15, 2011. There were ninety-four boxes rented at \$30 per year; twenty-four boxes rented at \$44 per year; seven boxes rented at \$76 per year; and one box rented at \$130 per year. The total amount of post office box rent loss per year totals \$4538.00. Can USPS afford to lose that much rent per year in favor of no fee rural delivery service to customers? The post office box rental fee loss over a ten year period if the box rent remains the same and if the number of boxes rented remains constant throughout the ten year period would be \$45,380. That is significant by most standards.

Change to rural service will necessitate additional delivery time, increased mail volume, and additional mileage. Will current rural delivery personnel be able to reasonably deliver mail to 125 additional roadside boxes and provide “maximum degree of service” to customers? Will an additional delivery person be required to complete the task of delivery in order to “maximum degree of service” to customers? Some Jonesville residents live five or more miles from the Jonesville Post Office and in what USPS would consider Karnack Post Office delivery area? Has the district considered the possibility that Karnack Post Office will have additional delivery responsibility and some Jonesville residents will not be allowed to keep their Jonesville address? The district has not addressed these concerns in any response to letters which mentioned the possible scenario. Does Waskom Post Office have an adequate number of rentable post office boxes to accommodate displaced Jonesville residents? If the district has not addressed these issues, USPS should dismiss their determination to close Jonesville Post Office for not only allowing a productive post office to remain open, satisfying the stated needs of customers, and without inconveniencing loyal postal patrons, but also to simplify the matter of managing complex rural delivery routes some of which obviously must cross paths. Perhaps the best alternative would be to have customers convene in the middle at the Jonesville Post Office for service.

District officials have frustrated and stressed Jonesville Post Office customers by failure to respond to specific questions, by disregarding potential cost saving strategies that would benefit USPS as well as customers, and by ignoring the needs of customers for the safety and sanctity of mail delivery free from exposure to crime such as could be the case with delivery to unattended mail boxes. Our roadways are not patrolled on a regular basis. Unattended mail boxes are an easy target whether or not one puts a lock on the box as Linda J. Welch Vice President of Southwest District Operations suggested

(See Reference #12, 12.14, p. 1, last paragraph). There have been numerous thefts and burglaries in our area of the county. (See Reference #13, Sheriff's Crime Report). The threat is real. Residents are concerned for loss of valuable mail and personal identity due to removal of mail from the unattended roadside mail box and due to removal of the roadside mailbox in total. Response such as "put a lock on the box" is inappropriate for those with limited budgets who cannot afford the expensive steel boxes that would be difficult for a criminal to remove. Residents in rural areas have concerns different from those who live in a town full of houses and patrol cars.

This small rural community has put forth much effort to establish justification for our post office. Defending our post office has been costly in terms of time, effort, and money devoted to securing and mailing useful facts to the district office. Residents and postal patrons have submitted more than 367 letters in support for continuing the post office. Disregard for stated concerns and questions does not encourage the continuation of loyalty to an entity such as the United States Postal Service. If we did not believe that Jonesville Post Office warranted continuation, would we have wasted so much time, effort, and money? Our rural community does not have widespread high speed internet access which is affordable for all. Residents who do have internet access most likely will start utilizing online banking and online statements if the post office closes and therefore that reaction will reduce mail volume and patronage to USPS. Is that what USPS wants? It would be an unfortunate happening and a preventable one. If the district had listened carefully to our concerns, it would have been clear that Jonesville is a community comprised of loyal USPS customers who want, need, and prefer traditional post office service rather than internet service. If our post office is closed, USPS will not likely reap the benefits of increased revenues our community has contributed over the past few years. Closure of Jonesville Post Office will be severing a long term relationship with a community which has been supportive of USPS and yet recently has been stressed by USPS officials who proposed this very negative closure proceeding. Even in these most difficult economic times, Jonesville customers have contributed significantly to the United States Postal Service. Tarnished respect due to unfair and unsubstantiated action will not be of benefit to USPS nor will tarnished respect help improve the USPS financial status. Why ruthlessly target small rural communities?

The postal employee (PMR) has provided exemplary service to the community. USPS has stated that she may be removed from postal service (See Reference #1, Item 35, Page 34, Final Determination Document). Jonesville Post Office has shown increases in revenue and increases in the number of box holders since the former postmaster retired. Recent increases are attributable not only to the loyal customers of Jonesville Post Office, but the outstanding service the PMR has rendered unselfishly to and for the United States Postal Service. The PMR has provided aid to Senior Citizens and handicapped customers throughout her period of service. The district has indicated that the postal service employee in Jonesville does not offer assistance to senior citizens and that the postal service employee does not render assistance to handicapped citizens (See Reference #9, 9.6 Content from the Final Determination

Documents). USPS has greatly misrepresented the truth for the PMR has often rendered service to senior citizens and handicapped customers. Why would any reasonable district official assert otherwise? I have personally witnessed the PMR rendering assistance on numerous occasions.

The Proposal to Close Jonesville Post Office and the Final Determination to Close Jonesville Post Office are full of errors which substantiates that the officials responsible for gathering facts, recording information, updating records, revising proposals, evaluating data, and carefully ensuring that all information contained in USPS official documents is truthful, accurate, and complete did not perform their duties with care and concern for customers of the United States Post Office in Jonesville, Texas. Mistakes, faulty submissions, fabricated entries in some instances, undocumented assertions, biased questionnaires, incomplete financial statements, no costs relative to transfer of services reported, no projected expenses for rural carriers noted, and insufficient replies to written concerns do not demonstrate evidence that USPS truly put forth proper effort to consider the impacts on the community or the impacts on the customers and businesses. Furthermore, USPS has indicated that alternative service by rural carrier or at another post office will suffice in providing service to customers displaced from Jonesville Post Office. The maximum degree of effective and regular postal service will not be provided to customers of Jonesville Post Office because rural delivery cannot possibly afford the same degree of safety and security of mail as compared to Jonesville Post Office locked boxes, nor could rural service provide the full range of services provided by a post office. Alternative service at another post office would impose driving and time impacts as compared with the currently available services provided at Jonesville Post Office which services are in closer proximity to residents and include Saturday morning window service. Waskom Post Office does not offer service on Saturdays. Maximum degree of service should at least mean the same degree of service as previously experienced. Furthermore, accurate economic savings to the United States Postal Service were not adequately calculated or considered by district officials who failed to submit any accounting for the transfer of service costs, for the loss of mail box rental fees in excess of \$4500.00 per year, for relocation of post office mail boxes, for continued payment of lease fees through the contract period, for employee costs for handling 127 additional customers, for delivery to possibly 127 additional rural roadside mailboxes or post office boxes, for relocation costs of the PMR should she be offered a transfer position elsewhere, nor for any other related transfer expense for which USPS will bear burden. Cost savings should not be promoted without full disclosure of the anticipated costs for making such a change. USPS's assertion of decline in mail volume at Jonesville Post Office when revenues have been increasing significantly give rise to question about the qualifications and the integrity of those USPS officials who were given responsibility for making important decisions relative to closure. Obviously, postal officials involved in this discontinuance feasibility study and this final determination did not perform duties in adherence with PO - 101 Discontinuance, did not support the decision with credible evidence, and did not grant customers and residents of Jonesville due process throughout changes to the official record which purportedly occurred prior to the Final Determination, but after the

comment period (See #12. 12.39). Frankly, actions by district officials seem to convey that our small rural post office was targeted unnecessarily, arbitrarily, and capriciously. The USPS final determination seems to exude abuse of discretion. Why close a small rural post office which has demonstrated significant increases in revenue and whose customers have expressed repeated concerns without legitimate response?

With the above statements made and considered, I submit my appeal and petition for review of the Final Determination to Close The Jonesville, Texas Post Office. I further submit my motion to suspend closure until such time as the Postal Regulatory Commission has rendered full consideration of the appeal and has rendered final advisory opinion to the United States Postal Service.

Respectfully submitted,
Lelia Vaughan
P. O. Box 129
Jonesville, Texas 75659-0129

Reference Enclosures: Index of Attachments
Attachment Documents #1 through #15

INDEX OF ATTACHMENTS

For ease of finding references, references are identified in the text of the appeal letter by Ref # followed by a specific reference type number and document number (Example: Reference #2, 2.2 identifies that the indicated reference is Congressional Record E3902-3904, August 17, 1982). Listing 2.2 indicates reference #2 under the category of History and document number 2. Where multiple pages occur within a document, the page number appears below the reference number. References to complete USPS documents utilize USPS identification notations such as Item Number and Page Number (Ex: NBR 10, p. 3 or USPS Item 2, p. 4) unless otherwise identified with reference type number and document number.

1. Final Determination to Close Jonesville Post Office as Posted 12/07/2011
2. History of Jonesville and Jonesville Post Office
 - 2.1 A Brief History of Jonesville Post Office
 - 2.2 Congressional Record E 3902 -3904, August 17, 1982
3. Notification Letter for Proposal to Close from Frank Richards
4. Content from Proposal to Close
 - 4.1 Title Page
 - 4.2 Authority to Conduct Investigation, 08/04/2011
 - 4.3 Notice of No Suspension
 - 4.4 Financial Summary
 - 4.5 - 4.6 Demographics and Facility Descriptions
 - 4.7 Blank Page, Place Holder for Verification of new service type
 - 4.8 - 4.9 Proposal Checklist
 - 4.10 - 4.11 Responsiveness to Community Postal Needs
 - 4.12 Postal Service Customer Questionnaire
5. Letters to District Not Included in the official Final Determination Document and For Which No Response was Received.
 - 5.1 To Allison Rizan, Dated August 15, 2011, Follow-up to Phone Call
 - 5.2 To Allison Rizan, Dated August 15, 2011, Asking More Questions
Delivery Confirmation Signature by L Vaughn August 19, 2011
 - 5.3 To Allison Rizan, Dated August 31, 2011, Documentation & Questions
 - 5.4 To Allison Rizan, Dated September 4, 2011, Questions
 - 5.5 To Allison Rizan, Dated September 14, 2011, Lessor's Offer Clarification
Delivery Confirmation Signed by Linda Vaughn
 - 5.6 To Allison Rizan, Dated October 11, 2011, Questions
 - 5.7 To Frank Richards, Dated August 14, 2011, Questions
Delivery Confirmation Signed by Frank Richards August 16, 2011
 - 5.8 To Frank Richards, Dated September 10, 2011 to Longview Address
Delivery Confirmation Signed by Virgil CK September 13, 2011
 - 5.9 To Frank Richards, Dated September, 10, 2011 to District Office
Delivery Confirmaton Signed by Debbie Tisdale September 14, 2011
 - 5.10 To Timothy Vierling, Dated September 22, 2011, Who is District Manager?
 - 5.11 To Manager of Customer Service & Sales, August 15, 2011, ZIP CODE

- 5.12 To Debora Ebera, September 14, 2011, Concerns for USPS Delivery Confirmation Signed by Debora Ebera September 19, 2011
 - 5.13 To Manager of Customer Service and Sales, August 18, 2011, ZIP CODE
 - 5.14 To Linda Welch, VP, September 12, 2011, Documentation Concerns
 - 5.15 To Linda Welch, VP, September 14, 2011, Concern for Public View of USPS Delivery Confirmation Signed by Agent September 16, 2011
 - 5.16 To Patrick Donahoe, August 16, 2011, Meeting Concerns & Lessor's Offer Delivery Confirmation signed by M. Reynolds August 24, 2011
- 6. Lease Reduction Communication
 - 6.1 Lessor's Lease Reduction Follow-Up Letter, August 22, 2011
 - 6.2 Letter from Linda Welch, dated September 2, 2011, Reason Why Not
 - 6.3 Letter from Allison Rizan dated September 12, 2011, Confused on Lessor
 - 6.4 - 6.5 Lease Amendment Dated September 20th and Executed by USPS on October 18, 2011 by Tod J. Taylor
 - 7. Census Data unavailable for 2010 unincorporated rural communities
 - 7.1 2010 Census Data for Jonesville Unavailable
 - 7.2 Rural Census Data Planned Release in October 2012
 - 8. Community Description Documentation Letters
 - 8.1 Letter to District Manager and Allison Rizan Dated August 31, 2011
 - 8.2 Letter to District Manager and Allison Rizan Dated September 4, 2011
 - 8.3 Letter to Linda Welch Dated September 12, 2011
 - 8.4 Letter to Allison Rizan Dated October 11, 2011
 - 8.5 Reply to 8.4 Letter from Debora Ebera Dated November 2, 2011
 - 8.6 Letter to District Manager August 31, 2011
 - 8.7 Letter to District Manager Dated October 20, 2011
 - 8.8 Letter to District Discontinuance Coordinator Dated October 20, 2011
 - 8.9 Letter to Debora Ebera Dated August 11, 2011
 - 9. Notable Content from 4 large notebooks in the Final Determination
 - 9.1 Postal Service Customer Questionnaire Analysis
 - 9.2 - 9.4 Postal Service Customer Community Meeting Analysis
 - 9.5 - 9.6 USPS Demographic and Facility Description
 - 9.7 USPS Financial Summary
 - 9.8 Economic Savings and Summary
 - 9.9 Checklist Notation on Economic Savings
 - 9.10 Memo to OIC/Postmaster from Allison Rizan
 - 9.11 Community Meeting Concern 18 Expressed by Pat Vaughan
 - 9.12 Pat Vaughan's Proposed Revision of Budget at Community Meeting
 - 9.13 Log of Post Office Discontinuance Actions
 - 9.14 Letter from Dean Granholm to District Manager Dated December 5, 2011
 - 9.15 - 9.16 Advantages and Disadvantages of Proposal & Effect on Community
 - 9.17 - 9.18 Effect on Employees, Economic Savings, and Summary
 - 9.19 Responsiveness to Community Postal Needs
 - 9.20 Analysis of 60-Day Posting Comments

10. Concerns about Questionnaire (See Index 4.12 for Questionnaire)
 - 10.1 Lelia Vaughan's Comments attached to her Questionnaire
 - 10.2 Frank Richard's Response to Comments Dated September 9, 2011
 - 10.3 Letter to Linda Welch and Patrick Donahoe Dated August 21, 2011
 - 10.4 Response to 10.3 Letter from Timothy Vierling Dated October 12, 2011
11. Public Information Release by USPS about Community Meetings
12. Letters to District/USPS and Responses Received
 - 12.1 Letter to Debora Ebera Dated August 11, 2011
 - 12.2 Response from Debora Ebera Dated August 23, 2011
 - 12.3 Letter to District Manager Dated August 15, 2011
 - 12.4 Response from Brenda Baugh Dated September 6, 2011
 - 12.5 Letter to District Manager Dated August 15, 2011
 - 12.6 Response from Brenda Baugh Dated September 13, 2011
 - 12.7 Letter to Linda Welch Dated August 15, 2011
 - 12.8 Response from Linda Welch Dated August 19, 2011
 - 12.9 Letter to District Manager Dated August 18, 2011
 - 12.10 Response from Brenda Baugh Dated September 19, 2011
 - 12.11 Letter to Patrick Donahoe Dated August 21, 2011
 - 12.12 Response from Timothy Vierling Dated October 12, 2011
 - 12.13 Letter to Linda Welch Dated August 21, 2011
 - 12.14 Response from Linda Welch Dated September 2, 2011
 - 12.15 Email to Victor Benavides Dated August 24 and 25, 2011
 - 12.16 Response Letter from Brenda Baughan Dated September 16, 2011
 - 12.17 Letter to District Manager Dated August 30, 2011
 - 12.18 Response from Brenda Baugh Dated September 14, 2011
 - 12.19 Letter to District Manager Dated August 31, 2011
 - 12.20 Response from Brenda Baugh Dated September 14, 2011
 - 12.21 Letter to District Manager Dated September 4, 2011
 - 12.22 Response from Brenda Baugh Dated September 16, 2011
 - 12.23 Letter to Allison Rizan Dated September 8, 2011
 - 12.24 Response from Allison Rizan Dated September 12, 2011
 - 12.25 Letter to Allison Rizan Dated September 12, 2011
 - 12.26 Response from Debora Ebera Dated November 3, 2011
 - 12.27 Letter to District Official Dated September 15, 2011
 - 12.28 Response from Debora Ebera Dated October 11, 2011
 - 12.29 FOIA Letter to Debora Ebera Dated October 6, 2011
 - 12.30 Response from Debora Ebera Dated November 8, 2011
 - 12.31 FOIA Letter to Manager of Records, Washington October 6, 2011
 - 12.32 Response from Myung Kang Dated November 15, 2011
 - 12.33 Letter to Discontinuance Coordinator Dated October 11, 2011
 - 12.34 Response from Debora Ebera Dated November 2, 2011
 - 12.35 Letter to Timothy Vierling Dated October 20, 2011

- 12.36 Response from Timothy Vierling Dated November 3, 2011
- 12.37 Letter to Discontinuance Coordinator Dated October 20, 2011
- 12.38 Response from Debora Ebera Dated November 2, 2011
- 12.39 Response from Allison Rizan Dated November 14, 2011
- 13. Harrison County Sheriff's Crime Report for Jonesville 75659
- 14. Letters to District Through Friends of Jonesville Post Office & Responses
Note: Friends of Jonesville Post Office made available to postal patrons sample letters to use/reword while seeking answers to questions from the district and expressing concerns for the discontinuance proposal. Well over 367 such letters were submitted. The responses contained herein are responses, I, Lelia Vaughan, received relative to my submissions of these letters.
 - 14.1 Letter to Allison Rizan Sent September 1, 2011
 - 14.2 Letter to Allison Rizan Sent September 2, 2011
 - 14.3 Letter to Manager Consumer Affairs Dated September 5, 2011
 - 14.4 Letter to Discontinuance Coordinator Dated September 5, 2011
 - 14.5 Letter to Discontinuance Coordinator Dated September 5, 2011
 - 14.6 Letter to Discontinuance Coordinator Dated September 11, 2011
 - 14.7 Letter to Discontinuance coordinator Dated September 15, 2011
 - 14.8 Letter to Manager Consumer Affairs Dated September 14, 2011
 - 14.9 Letter to District Officials Dated September 16, 2011
 - 14.10 Letter to District Officials Dated September 17, 2011
 - 14.11 Letter to Discontinuance Official Dated September 21, 2011
 - 14.12 Letter to Discontinuance Official Dated September 22, 2011
 - 14.13 Letter to Discontinuance Officials Dated September 24, 2011
 - 14.14 Letter to Discontinuance Coordinator Dated September 26, 2011
 - 14.15 Response from Debora Ebera Dated October 24, 2011
 - 14.16 Letter to Discontinuance Coordinator Dated September 28, 2011
 - 14.17 Response from Debora Ebera Dated October 3, 2011
 - 14.18 Letter to District Officials Dated September 30, 2011
 - 14.19 Response from Debora Ebera Dated October 13, 2011
 - 14.20 Letter to Manager Consumer Affairs Dated October 5, 2011
 - 14.21 Response from Debora Ebera Dated October 14, 2011
 - 14.22 Letter to Manager Consumer Affairs Dated October 6, 2011
 - 14.23 Response from Debora Ebera Dated October 13, 2011
 - 14.24 Letter to Manager Consumer Affairs Dated October 8, 2011
 - 14.25 Response from Debora Ebera Dated October 14, 2011
 - 14.26 Letter to District Officials Dated October 10, 2011
 - 14.27 Response from Debora Ebera Dated November 2, 2011
 - 14.28 - 14.38 Ten Identical Responses dated November 7, 2011 received from Allison Rizan in one envelope with no specific customer's letter or letter date referenced

- 15 Business Letters to District and Responses
 - 15.1 Partner in T. C. Lindsey & Company to District Dated September 3, 2011
 - 15.2 Response from Debora Ebera Dated September 12, 2011
 - 15.3 Two identical responses from Allison Rizan Dated November 7, 2011
 - 15.4 Partner in Big Bluff Land Management to District September 3, 2011
 - 15.5 Five identical responses from Allison Rizan Dated November 7, 2011
 - 15.6 Vaughan Properties to District Officials Dated September 3, 2011
 - 15.7 Two identical responses from Allison Rizan Dated November 7, 2011
 - 15.8 EXCO Operating to Allison Rizan Dated August 29, 2011