

**BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001**

Complaint of : Greater East Texas Area Local Docket No.
And Consumers of USPS

COMPLAINT OF: Greater East TX Area Local & Consumers
REGARDING FAILURE TO REVISE AND UPDATE
INFORMATION TO THE UNION & CONSUMERS
ON THE AMP STUDY FOR EAST TX P&DC

APRIL 10, 2013

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I. 1. The USPS has announced acceleration on plans to shutter the East TX Processing & Distribution Plant in Tyler TX and scatter the mail currently processed there, to three other locations increasing the distance the mail must travel by ten times greater than it's current path. Only one other location: Savannah, GA has been slated in like kind—to scatter the regional community's mail in three directions. This action violates the Postal Regulatory Commission's mission to hold the Postal Service accountable be in compliance, and to remain financially secure. Title 39 U.S. C. Chapter 36 as added by this Act the Postal service shall in consultation with the PRC, develop and submit a plan to meet the standards including HR6407 (109th) Postal Accountability and Enhancement Act Section 302 POSTAL FACILITIES (C) (D) (ii) Section 302. Postal Service Plan C 3 CONTENT OF FACILITIES PLAN (A) (B) (C) (D)

2. AMP study done in 2011 is outdated, was never accurate; changes have occurred in staffing, savings have been captured through new low wage postal support employees, the communities potentially affected have not been provided adequate public notice, and no revised network plans given to the PRC as per required by the PAEA which the PRC oversees. Congressman Louie Gohmert (R-TX) represents the district where East TX P&DC is located and exposed the errors and lack of diligence in the AMP study on closing the Tyler plant. His 11 minute presentation complete with illustrations before Congress can be seen at http://www.youtube.com/watch?v=rsqp67B_A1s It is necessary viewing for anyone trying to ascertain the validity and broad-reaching scope of the complaints herein.

3. NLRB Ruling (3-1-2013) USPS must provide un-redacted copies of completed AMP Feasibility studies with supporting data; management has failed to do so prior to any decision to approve a study, and continues not to provide information requested including revised updated information. This violates the statues Title 39 Chapter 3691 Sec.302 Postal Service Plan. Under 3662 101(d) the USPS agrees to act in efficient economical ways and fails when it does not revise the AMP studies after changes have occurred that drastically cause savings, however seem unwilling to provide new studies that show that moving mail from one facility to another fails to save any monies and delays mail.

4. New Public meeting is requested after USPS provides information as per NLRB Award and requesting PRC to use their enforcement tools to direct the Postal Service to halt East Texas P&DC Area Mail Processing implementation until section 302 C 1 (c) and (d) of the PAEA has been provided wherein the Postal Service needs to continue to revise its network to meet the new conditions of the plant as well as keep unions informed, and elected officials informed. The Postal Service is required to abide by procedural requirements contained in the national agreements and 302 C 3 A,B, C, D of the PAEA wherein new identification of costs and savings be completed and then make a new decision based on the updated facts. 54 additional facilities nationwide have similarly been affected.

II. Requesting that the PRC ensure that the postal system is accessible, transparent, and financially secure by using their enforcement tools and subpoena power and authority to direct the Postal Service to stop any further accelerated AMP implementations of the 55 targeted cites for this summer 2013, due to unreliable data, and failure to comply with applicable postal laws including the Postal Accountability and Enhancement Act and Title 39 USC.

III. There has not been a true study on the adverse affects of closings or consolidations of the Plants on small and large businesses within the communities. These 55 Plants are many times the back up for mail processing when there are power outages, storms, and catastrophes. Many of these plants have the bio-hazard detection systems for Anthrax to provide safety to customers as well as employees that are necessary during emergencies. Management has hidden the costs of moving mail & equipment from one location to another, especially over the 50 mile radius.

IV. Network rationalization has been based on false savings estimates, inaccurate data and will have maximum adverse impact on customer service, business mail entry, and retail and delivery service will be changed drastically. No new notification. The 55 accelerated AMP Implementations for 2013 will affect Service Standards and fail to promote the USPS as reliable, efficient and relevant for the future. This violates 39 USC 3662 101(d) and Section 302 of the PAEA that states the Postal Service has to revise its distribution network to meet changing conditions and must best suit operational needs; yet they have failed to update after so many changes have been made at these facilities over the last 2 years.

V. The East TX P&D Center is self-efficient, located in prime area for easy access to Interstate 20 strategically located between Shreveport-Bossier City in Lousiana and Dallas-Ft Worth Metroplex in Texas. The AMP move is to send mail (raising transportation costs) in three different directions so that a letter mailed from Longview to her sister city 38 miles away will now travel to Shreveport (where the Longview split is designated) then up to North TX P&DC (where the Tyler split is designated) and then back into Tyler for delivery. A 38 mile trip transformed

into a 389 mile trip and promoted as “savings” and “efficient”. The North TX P&DC and the Shreveport P&DC are at maximum throughput and space now without absorbing the volume from E TX P&DC. The East Tx region and in particular Tyler-Lgv is one of the fastest growth areas in the Ark-La-Tex. Fed-EX has recently announced plans for a major hub. While competitors see the need for growth and expansion, the USPS is shuttering plants and giving the business away to competitors. The odds of two companies in the mailing industry analyzing the same area and one decides to pull out, while another decides to expand; makes it apparent that someone is using flawed data or simply is blinded to the data because the decision was made before collection of the data. The fact that one deciding to shutter is unionized hints that ulterior motives other than efficiency are the goal.

VI. We have requested the evidentiary support that the Postal Service has denied all 229 facilities with un-redacted copies of AMP studies hiding actual costs for moving mail and equipment and we still have not received transparency and documents from the USPS. We are requesting new studies as we are in need of the most updated report since changes have occurred in staffing, new postal support low wage earners, and mail volume increases in parcels. Transparency needs to be enforced by the PRC.

VII. The 55 AMP sites accelerated for Advance Implementation scheduled for the summer of 2013 need to be addressed by the PRC. The PRC has not resolved these issues and violations of the PAEA and 39 3662 101(d). These studies are outdated, and the Union Reps were denied AMP Feasibility studies and PIRs. NLRB ruled we have the right to these studies and they should be given prior to a public meeting as well as prior to a decision to implement.

VIII. The remedy requested is that the PRC utilize their enforcement tools and direct the USPS to cease implementation of the 55 cites to be either closed or consolidated. Cease movement of any mail and/or equipment from any of the 55 plants. Restore mail to plants where previously processed. The PRC needs to use their subpoena power and authority to force new AMP studies due to the old studies being outdated. They do not reflect new savings and less staffing that has occurred due to retirements. The study should include the new rise in

