

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Public Inquiry on Resolving
Suspended Post Offices

Docket No. PI2022-1

INITIAL COMMENTS OF STEVE HUTKINS

(May 16, 2022)

Pursuant to Order No. 6101, I respectfully submit these comments for the Commission's Public Inquiry concerning the resolution of suspended post offices.¹ My comments focus on one step the Commission could take that might help address some of the issues associated with unresolved emergency suspensions. The Commission could work with the Postal Service to create a suspension dashboard that contains information about the post offices under suspension and their status in any discontinuance process that has been initiated. Such a dashboard would not be burdensome to set up and maintain, it would improve transparency and accountability, it would help communities and customers whose post office has been suspended by making important information readily accessible, and it might incentivize the Postal Service to resolve the backlog of suspensions and avoid future backlogs. My comments consider what information the dashboard could contain and describe a prototype I have created on my website, [savethepostoffice.com](https://www.savethepostoffice.com).²

¹ Docket No. PI2022-1, Notice and Order Providing an Opportunity to Comment on the Postal Service's Process for Resolving Suspended Post Offices, February 3, 2022 (Order No. 6101).
https://www.prc.gov/docs/120/120836/Order_6101.pdf

² Available at <https://www.savethepostoffice.com/post-office/suspension-dashboard/>

I have been following post office suspensions and discontinuances on savethepostoffice.com since 2011. The site includes articles about more than 150 suspensions, discussions of issues concerning suspensions and discontinuances, and many lists and maps inventorying suspensions and closures.³ I have also contributed comments on previous Commission dockets concerning suspensions and closings.⁴

The Backlog

Over this past decade, one of the main issues regarding post office closures has been emergency suspensions. In many cases, it appeared to local communities and other observers that the Postal Service was using the suspension provision to close post offices without going through a lengthy discontinuance process and without making a good faith effort to solicit public comment. As the Commission has previously stated, the Postal Service may be circumventing post office discontinuance requirements, such as obtaining and considering customer input, “by suspending post offices and allowing them to simply remain suspended without any action.”⁵

³ Archived at <https://www.savethepostoffice.com/tag/emergency-suspensions/>. One of my inventory articles was cited in *United States Postal Service: A Sustainable Path Forward: Report from the Task Force on the United States Postal System*, December 2018 at 15 (footnote 51). https://home.treasury.gov/system/files/136/USPS_A_Sustainable_Path_Forward_report_12-04-2018.pdf

⁴ See Initial Comments on the Commission’s Jurisdiction Over Post Office Closings (Feb. 4, 2016) and Initial Comments Regarding the Commission’s Section 701 Report (June 14, 2016). <https://www.prc.gov/docs/94/94905/Hutkins%20re%20PI2016-2.pdf>; https://www.prc.gov/docs/96/96200/Hutkins_Comments_on_701_Report.pdf

⁵ Order No. 6101 at 20, quoting Order No. 335 at 3, Docket No. PI2010-1, Notice and Order Providing an Opportunity to Comment, November 9, 2009. https://www.prc.gov/docs/65/65562/Order_No_335.pdf

This is not a new problem. In 1999 Congress held a hearing about post office closures and suspensions.⁶ Howard Foust, the President of NAPUS, presented a Congressional committee with a list with over 500 offices “under temporary emergency suspension,” 220 of which were over five years old. “That does not sound like temporary to me,” Foust told Congress. People affected by the suspensions, he testified, “have concluded that the Postal Service has elected to circumvent the Postal Reorganization Act procedure for closing a post office by using the suspension ploy.”

The Commission has been tracking suspensions for many years as part of its annual compliance review and to follow up on its 2010 Public Inquiry docket on suspensions. As of the end of FY 2016, there was a backlog of 662 suspensions, many going back ten years or more.⁷ The Commission has repeatedly and consistently encouraged the Postal Service to clear this backlog. Some progress has been made. Approximately 456 of the suspensions from FY 2016 have been resolved, nearly all by discontinuing the post office. But at the same time, new suspensions have been added to the backlog list. At the end of FY 2021 there was a backlog of 425 suspended offices.⁸

According to Order No. 6101, the Commission seeks to expedite the resolution of this backlog out of “concern regarding the apparent lack of commitment by the Postal

⁶ Guidelines for the Relocation, Closing, Consolidation or Construction of Post Offices, Hearing before the International Security, Proliferation, and Federal Services Subcommittee (October 7, 1999). <https://www.govinfo.gov/content/pkg/CHRG-106shrg61701/html/CHRG-106shrg61701.htm>

⁷ See Docket No. ACR 2017, Library Reference USPS-FY17-33, December 29, 2017, folder “USPS.FY17.33.Files,” Excel file “Post.Office.FY2017.xlsx,” Tab “Suspended Start of FY17.” <https://www.prc.gov/dockets/document/103288> Available at <https://tinyurl.com/2p946mtw>.

⁸ See Docket No. ACR 2021, Responses of the United States Postal Service to Questions 1-21 of Chairman’s Information Request No. 11, February 11, 2022, ChIR 11 Response Attachments, Tab “Suspended End of FY21.” <https://www.prc.gov/dockets/document/120910>. Available at <https://tinyurl.com/y8rjjrus>.

Service in addressing and resolving” them. Order at 3. The Commission offers no specific suggestions about how resolving the suspensions might be expedited, and it’s not clear what steps would be within the Commission’s authority. According to the USPS Discontinuance Guide, the Commission has no role when the Postal Service suspends a particular post office, and its role in the discontinuance process for individual post offices is limited to responding to appeals.⁹ The Commission has not identified any penalties it might impose on the Postal Service for failure to clear this backlog or for using the suspension provision to conduct de facto discontinuances.

Suspension Bills

Congress has addressed the suspension issues on several occasions. In 1999 Representative Earl Blumenauer introduced H.R.670 (S.556). It included a provision that was intended to prevent the Postal Service from misusing the right to suspend services by guaranteeing that suspensions would last no longer than 180 days.¹⁰

In 2016 Senators Claire McCaskill and Jerry Moran introduced S.3452, the Post Office Discontinuance Accountability Act.¹¹ It addressed the problem of long-term suspensions by requiring the Postal Service to either proceed with a discontinuance procedure or restore service within 180 days after a suspension occurs. If the post office

⁹ United States Postal Service, Postal Service-Operated Retail Facilities Discontinuance Guide, Handbook PO-101, October 2012. See Docket No. ACR2020, Responses of the United States Postal Service to Questions 1- 26 of Chairman’s Information Request No. 3, January 22, 2021, “ChIR.3.Response.Attachments.zip,” folder “ChIR 3 Question 13,” PDF file “ChIR.3.Q.13.Handbook.PO_101.pdf.” <https://www.prc.gov/dockets/document/115895/>. Available at http://www.savethepostoffice.com/wp-content/uploads/2022/05/Handbook.PO_101.pdf

¹⁰ H.R.670 - Post Office Community Partnership Act of 1999, Feb. 10, 1999. <https://www.congress.gov/bill/106th-congress/house-bill/670>

¹¹ S.3452 - Post Office Discontinuance Accountability Act of 2016, Sept. 28, 2016. <https://www.congress.gov/bill/114th-congress/senate-bill/3452/>

were still suspended after a year, the Postal Service would be required to offer additional opportunities for public input, including an in-person meeting. The bill would also prohibit suspending a post office due solely to a lease expiration, which remains the most common cause for a suspension and was one of the main topics of the Commission's 2010 Public Inquiry docket.¹²

In 2018, Senator McCaskill introduced a new version of her suspension bill, S.1204.¹³ It added a provision that would have allowed a person served by a post office to file an appeal to the Commission if it has been suspended for more than one year, and it also required the Postal Service to consult with the Commission about revisions of Handbook PO-101 regarding suspensions.

Also in 2018, Senator Thomas Harper introduced S.2629 - Postal Service Reform Act of 2018.¹⁴ While not focused primarily on suspensions, this bill contained a section (213) that encompassed many aspects of the suspension process. It addressed long-term suspensions by requiring the Postal Service to host a second public meeting if service has not been restored after 180 days and a third meeting if service has not been restored after one year.

Earlier this year, Congresswoman Cynthia Axne of Iowa introduced a bill that would require the Postal Service to create a suspension dashboard.¹⁵ H.R.6355, The

¹² Docket No. P12010-1, Order No. 335, Notice and Order Providing an Opportunity to Comment, November 9, 2009. https://www.prc.gov/docs/65/65562/Order_No_335.pdf

¹³ S.1204 - Post Office Discontinuance Accountability Act of 2018, May 23, 2017 <https://www.congress.gov/bill/115th-congress/senate-bill/1204/>

¹⁴ S.2629 - Postal Service Reform Act of 2018, April 9, 2018 <https://www.congress.gov/bill/115th-congress/senate-bill/2629/>

¹⁵ H.R.6355 - To require the Postal Service to establish a website providing information on post offices experiencing emergency suspensions, and for other purposes, Jan. 6, 2022 <https://www.congress.gov/bill/117th-congress/house-bill/6355>

Postal Suspension Transparency Act, responds to concerns from Axne's constituents who had experienced a suspension and to a recent OIG report on suspensions.¹⁶ It would "require the Postal Service to establish a website providing information on post offices experiencing emergency suspensions, and for other purposes." H.R.6355 is specific about what this "public-facing dashboard" would contain for each suspended office:

- a. A street address
- b. The date on which the relevant emergency suspension for such covered post office took effect
- c. The reason for such emergency suspension
- d. Alternative services available, including how to request curbside delivery
- e. The location of, and hours of operation for, the nearest facility providing retail access to postal services
- f. To the extent practicable, the estimated date on which operations at such covered post office will resume

The bill indicates that the dashboard should be interactive and enable a user to search, filter, sort and download the data. Noting how much people depend on the post office and how important it is for facility closures to be quickly addressed, Congresswoman Axne describes the legislation as "a commonsense way to make sure the Postal Service is keeping everyone informed in the event of unforeseen disruptions."¹⁷

¹⁶ United States Postal Service, Office of Inspector General, Report No. SM-AR-18-007, *U.S. Postal Service Emergency Suspension Process*, September 24, 2018.
<https://www.uspsoig.gov/sites/default/files/document-library-files/2018/SM-AR-18-007.pdf>

¹⁷ "Rep. Axne Unveils Bill to Boost Public Transparency at the U.S. Postal Service"
<https://axne.house.gov/media/press-releases/rep-axne-unveils-bill-boost-public-transparency-us-postal-service>

Service Disruption Alerts

The Postal Service already maintains a section on its website about recent service disruptions alerts. There are notices about the most recent disruptions, state by state, as well as a national map and a spreadsheet list.¹⁸ The spreadsheet contains the following information:

- a. Name of post office
- b. Date of disruption
- c. Date of last update
- d. Affected ZIP code areas
- e. State
- f. Reason for disruption
- g. Projected resume date for operations
- h. Operations impacted (including retail)
- i. Location where operations have been moved

These service disruptions usually involve weather events like hurricanes and earthquakes, but in some cases the causes are like those that can lead to a suspension, such as safety issues and structural damage. Some of the post offices on the service disruption report are described as having been suspended, and some appear on the suspension lists shared with the Commission. But most of the offices on the disruption alert spreadsheet are not on the suspension lists, and most of the offices

¹⁸ The Residential Service Disruption page is available at <https://about.usps.com/newsroom/service-alerts/residential/welcome.htm>. The latest service alert spreadsheet is at <https://about.usps.com/newsroom/service-alerts/msureport.xls>. The report as of May 3, 2022, is at <https://tinyurl.com/y65wczsy>

on the suspension lists are not on the disruption list.¹⁹ Consequently, it's not clear when a "disruption" becomes a "suspension" and vice versa. In any case, the disruption alert spreadsheet is another model for what data a suspension dashboard might include.

In addition to the service alert page, the Postal Service maintains a Find USPS Locations website, which has a page for each post office containing its address, retail services, hours of operation, and location map.²⁰ The site does not indicate if a post office has been suspended. Instead, suspended offices are typically removed from the site completely. In some cases, however, the PO Locator shows offices as still in operation even though they appear on the suspension lists.²¹

The Administrative Record

Another source of ideas for a suspension dashboard is the administrative record that the Postal Service develops during the discontinuance process. As part of the process, this record must be made available to the public, and when an appeal is filed over a discontinuance, the Postal Service is also required by 39 CFR § 3021.21 to file the administrative record with the Commission.

The administrative record typically includes several components, many of which may also be included in the proposal that initiates a discontinuance study.:

¹⁹ The May 3, 2022, disruption report contains 349 post offices. For approximately 97 of them, the disruption occurred during FY 2021 and included "no retail." Approximately 18 of these offices appear on the suspension list as suspended during FY2021. (See ACR2021, Responses of the United States Postal Service to Questions 1-21 of Chairman's Information Request No. 11, February 11, 2022, ChIR 11 Response Attachments, Tab "Suspended During FY21." Available at <https://tinyurl.com/y8rjjrus>.) Over 90 offices thus experienced a disruption of retail services but were not classified as suspended.

²⁰ <https://tools.usps.com/find-location.htm>

²¹ At least 25 offices that show as still suspended on the February 11, 2022, suspension list appear as open on the USPS Find Locations page. It's not clear if this is because the Locator site has not been updated, the suspended office had not been identified correctly, or some other reason.

- a. The post office's location and hours of operation
- b. A list of nearby post offices, with their addresses and hours from the USPS Find Locations page and a map, particularly the office where boxes were relocated, with distances to these other locations
- c. Photographs of the post office exterior
- d. The number of post office boxes in use
- e. A summary of the concerns expressed at the community meeting and comments submitted in writing, along with the USPS responses
- f. A discussion of the advantages and disadvantages of the proposal to discontinue
- g. Potential effects of a closure on community
- h. Potential effects on postal employees
- i. Economic savings, with annual lease costs, renewal dates and options, as well as basic data about revenue, workload and transactions
- j. Notice of the right to appeal to the Commission²²

The proposal to discontinue and the administrative record must be made available to the public for inspection by posting them in the retail facility under study and at other facilities "likely to serve a significant number of customers of the facility under study." PO-101 at 25. In the case of a suspension, the proposal must also be posted at the installation providing alternative services. Given the difficulties of making these materials available for suspended post offices, an online dashboard would be a very useful way to share this record.

²² The Postal Service takes the position that appeal rights apply to "Post Offices only," not stations and branches, and the notice of appeal rights is typically not included in the final determination posting. Handbook PO-101 at 22.

A Prototype Dashboard

To illustrate what a suspension dashboard could look like, my website offers a prototype.²³ It contains some of the information called for by H.R.6355, as well as the kind of information found on the USPS service disruption alert page and the administrative record for discontinuances. The dashboard includes all the data on the suspension spreadsheets the Postal Service has been providing the Commission, combined with data from other sources, including a list provided in the POSTPlan docket,²⁴ the USPS Facilities Reports on leased properties,²⁵ and other publicly available sites. It contains the following:

- a. Name of the office
- b. Address of the office²⁶
- c. Date of suspension, reason for suspension, dates for the proposal and community meeting, and the stage in the reopening or discontinuance process (from the lists provided by the Postal Service to the Commission);
- d. A photo of the exterior (usually from Google Street Views)
- e. A link to a Google map showing the location of the office
- f. A link to a Google map showing post offices in the surrounding area
- g. Distances in drive time and miles to the nearest post office (based on the Google map)

²³ Available at <https://www.savethepostoffice.com/post-office/suspension-dashboard/>

²⁴ For data on POSTPlan levels, workload, and distance to APO, see Docket No. N2012-2, Library Reference USPS-LR-N2012-2/11, Summary Updated.xls, July 19, 2012. <https://www.prc.gov/dockets/document/83663>. Available at <https://tinyurl.com/47pd48xj>.

²⁵ See USPS Leased Facilities Reports, available at <http://about.usps.com/who-we-are/foia/leased-facilities/report.htm>. The dashboard uses a 2015 version of these reports, archived at <https://tinyurl.com/mr39w784>.

²⁶ The addresses come from various sources, including a list on PostalPro, at <https://postalpro.usps.com/service-hubs-and-facilities/facilityfile> (available at <https://tinyurl.com/ms2b9syv>), the POSTPlan Summary Updated list, the USPS Facilities Reports, and Google searches.

- h. Distance to the Administrative Post Office (based on data shared in the POSTPlan docket)
- i. POSTPlan level (if applicable)
- j. Workload if POSTPlan (if applicable)
- k. Number of post office boxes in use (also from the POSTPlan docket)
- l. Population data on total pop and rural pop from the census²⁷
- m. Lease data from the facilities reports
- n. Community profile information from Wikipedia
- o. Census data from a zip code website

This prototype dashboard contains some inaccuracies and is incomplete in several respects. In some cases, the post office's address on the dashboard may be incorrect because the suspension reports provided to the Commission do not always have enough information to determine the correct address, especially for suspensions that happened many years ago. Without a specific address, it is not possible to accurately identify the office, measure distances to alternative offices and do other spatial analysis, as suggested by Order 6101 at 4. The data on workload and distances to an Administrative Post Office were available only for the small offices covered by POSTPlan. The census data on population, downloaded from the US Census website, was not available for every ZIP code, apparently because the Census uses ZIP Code Tabulation Areas.²⁸ The Postal Service's spreadsheet for the suspensions that occurred

²⁷ See <https://www.census.gov/data.html>. The population data has been downloaded from the Census site and posted on Google Docs at <https://tinyurl.com/5ce8xy58>.

²⁸ According to Wikipedia, there are approximately 42,000 ZIP Codes and 32,000 ZCTAs. The reason that there is not one ZCTA for every ZIP Code is that only populated *areas* are included in the Census data, and thus ZIP Codes that only serve PO Boxes have no corresponding ZCTA. https://en.wikipedia.org/wiki/ZIP_Code_Tabulation_Area

after FY 2016 does not include information about the date when the proposal was submitted, the date of the public meeting, and the stage of the discontinuance process — information that was included in the spreadsheet on the FY 2016 list. The dashboard consequently lacks this important data. Finally, the dashboard does not contain any information about the alternate access facilities provided to customers of the suspended offices. While typically included in press releases and posting notices at local facilities, this information was not readily available for the 450 suspensions.

Despite these problems, the dashboard provides a model for how the information could be presented. Like the USPS Find Locations site, it has a page for each office.²⁹ As required by Representative Axne's bill, there's a table that can be searched, filtered, sorted and downloaded.³⁰ As one would find in a proposal to discontinue, the dashboard includes maps showing the surrounding post offices, distance and drive times to these other facilities, as well as information about boxes in use, lease costs, and so on.

There is also a national map with all the suspensions.³¹ It has four layers, based on when the suspension took place and the categories in Commission Order 6101 at 27: (1) FY1984-FY2012 (i.e., pre-POSTPlan suspensions); (2) FY2013-FY2016; (3) FY2017-2020; and (4) FY2021. Together, the first two layers contain the 206 suspensions remaining from FY 2016 and before; the third layer consists of those suspensions that took place after FY 2016, and the fourth layer, the recent suspensions.

The dashboard includes all the 453 offices suspended at the end of FY 2021, as cited in Order 6104, which was based on a library reference filed with the FY2021 ACR

²⁹ <https://www.savethepostoffice.com/post-office/suspension-dashboard/>

³⁰ <https://www.savethepostoffice.com/suspended-post-office-table/>

³¹ <https://www.savethepostoffice.com/suspended-post-office-map/>

on December 29, 2021.³² This list was subsequently updated on February 11, 2022, with a list showing 425 offices suspended at the end of FY 2021.³³ The update list shows one office that had not appeared on the December 29 list, bringing the total on the dashboard to 454.³⁴ This includes 207 suspensions from FY 2016 and before, plus 247 from after FY 2016. The dashboard shows 30 offices have been reopened and 424 remain suspended.³⁵

The dashboard does not include suspensions that may have occurred but that do not appear on the two suspension lists provided by the Postal Service. For example, according to a USPS news alert, the post office in Sandia, TX was suspended due to safety concerns on October 9, 2020.³⁶ According to a news article, the Bay Station Post Office in Brooklyn, NY closed due to a fire in February 2021 and remained closed a year later.³⁷ According to a USPS Industry Alert, the post office in Powhatton, KS was

³² See Docket No. ACR2021, Library Reference USPS-FY21-33, December 29, 2021, folder "USPS.FY21.33.Files," Excel file "PostOfficesFY2021.xlsx," tab "Suspension Summary." <https://www.prc.gov/dockets/document/120538>. Available at <https://tinyurl.com/4ammxhuv>.

³³ See ACR2021, Responses of the United States Postal Service to Questions 1-21 of Chairman's Information Request No. 11, February 11, 2022, ChIR 11 Response Attachments, "ChIR No. 11 Q 3," Tab "Suspended End of FY21." <https://www.prc.gov/dockets/document/120910>. Available at <https://tinyurl.com/y8rjjrus>. For details about the discrepancies between the lists of December 29, 2021 and February 11, 2022, see the USPS response to Question 2. <https://www.prc.gov/docs/120/120910/ChIR%20No.%2011.Responses.pdf>

³⁴ The German Village Finance post office, suspended on May 30, 2019, did not appear on the Dec. 29, 2021 list, but it does appear on the Feb. 11, 2022, update.

³⁵ The February 11 update shows 425 as still suspended, but two of them — Kenmore, MA and Glendale, KY — have reopened. The Kenmore, MA post office appears on the Feb. 11, 2022 list as suspended at the end of FY2021, but a USPS press release indicates it reopened at a new location on March 2, 2021. <https://about.usps.com/newsroom/local-releases/ma/2021/0302-postal-service-is-back-in-kenmore-square.htm>. The Glendale, KY office appears on the Feb. 11 list as still suspended, but I've been informed by email that it was reopened in FY 2022.

³⁶ "Sandia, TX, Post Office Temporarily Suspends Operations," USPS News, October 9, 2020. <https://about.usps.com/newsroom/local-releases/tx/2020/1009-sandia-tx-po-temporarily-suspends-operations.htm>

³⁷ "Sheepshead Bay Post Office still closed a year after fire," Brooklynpaper.com, April 19, 2022. <https://www.brooklynpaper.com/sheepshead-bay-post-office-still-closed-a-year-after-fire/>

suspended due to safety concerns on June 14, 2021.³⁸ According to a USPS news release, the post offices in Tangipahoa, LA and Boutte, LA were suspended due to safety issues following Hurricane Ida on September 7, 2021, and they did not reopen until March 28, 2022.³⁹ These suspensions all occurred during FY2021 and all but Bay Station appear on the disruption alert list, but none of them appears on the suspension lists provided to the Commission, and they haven't been included on the dashboard.⁴⁰

Spatial Analysis

The Commission states that it “welcomes comments with any data analysis related to suspended post offices, including, but not limited to, the spatial analysis of suspended post offices.” Order 6101 at 4. In addition to the maps showing the locations of the suspensions and the maps showing nearby post offices, the dashboard contains a spreadsheet with a wide range of data, much of it available for spatial analysis. The following statistics are derived from this table. The numbers are approximations and, except where noted, encompass all 454 offices on the dashboard.

- Approximately 20 percent of the suspensions took place between fiscal years 1984 and 2012, 27 percent during FY 2012-2016, 22 percent during FY 2017-2020, and 30 percent during FY 2021.

³⁸ “Central Area - Kansas - Missouri District Office Temporarily Suspended – Powhattan Post Office,” USPS Industry Alert, June 14, 2021. <https://postalpro.usps.com/node/9697>

³⁹ “Tangipahoa and Boutte Post Offices to Resume Operations Monday, March 28,” USPS News, March 25, 2022. <https://about.usps.com/newsroom/local-releases/la/2022/0325-tangipahoa-and-boutte-post-offices-to-resume-operations-march-28.htm>

⁴⁰ See ACR2021, Responses of the United States Postal Service to Questions 1-21 of Chairman's Information Request No. 11, February 11, 2022, ChIR 11 Response Attachments, “ChIR No. 11 Q 3,” Tab “Suspended During FY21.” Available at <https://tinyurl.com/y8rjjrus>.

- Lease-related issues are identified as the cause for 46 percent of the suspensions; safety issues, 29 percent; building damage, 8 percent; natural disasters, 5 percent; no qualified personnel, 3 percent; building closed by lessor, 2 percent; miscellaneous and other reasons, 7 percent.
- The dashboard shows that all 30 steps of the discontinuance process have been completed for 33 offices. Another 136 have reached step 29.⁴¹
- For the 424 offices still suspended at the end of fiscal year 2021, the average length of the suspension (as of September 30, 2021) was 5.7 years, with 19 suspensions over 15 years old, 66 suspensions over 10 years old, and 209 over 5 years old.
- The dashboard shows the required community meeting date for 189 offices. Approximately 64 took place more than ten years ago.
- Based on data from Postmaster Finder, which provides the date established for 127 of the suspended post offices, approximately 102 were established before 1900.⁴²
- Approximately 288 of the suspensions occurred at POSTPlan offices. That's 77 percent of the 372 unresolved suspensions that have taken place since POSTPlan was implemented in 2012. Approximately 43% of the POSTPlan offices were Level 2, 46 percent were Level 4, and 12 percent were Level 6. For context, under POSTPlan, 13,161 offices were downgraded, and of these, 15% were Level 2, 52% were Level 4, and 33% were Level 6.

⁴¹ For a description of these steps, see Order 6101 at 11 and Attachment at 1.

⁴² See <https://about.usps.com/who/profile/history/postmaster-finder.htm>. A list of the offices with their established date is available at <https://tinyurl.com/44ypbwa6>.

- According to calculations derived from Google maps, the average distance to the post office nearest the suspended office was 5.2 miles, the average drive time, about 8 minutes. For the 250 post offices where the ZIP code population was 100% rural (and for which data were available), the average distance was 6.7 miles and average drive time, 9.3 minutes.
- Many of the nearby post offices reflected in these distances are POSTPlan offices open only part of the day. The table shows that the average distance to the Administrative Post Office (APO) open 8 hours a day was about 10.8 miles. That is similar to the average distance to an APO on the full POSTPlan list, 10.2 miles.⁴³
- Each POSTPlan office had, on average, 89 post office boxes. For all the POSTPlan office, there were 26,400 boxes in use. Some of these boxes were relocated to other post offices, but many were not.
- Of the 372 suspensions for which the Zip code had a corresponding Census Zip, 250 occurred in ZIP areas that were 100 percent rural, with an average population of 635 and a total population of about 158,000. The total population for all these 372 suspension areas was 2.7 million, with an average population per ZIP code of 7,359.
- For the 314 offices for which data were available in the USPS facilities reports for 2015, the average annual lease cost was \$15,627. For the 193

⁴³ For data on POSTPlan levels, workload, and distance to APO, see Library Reference USPS-LR-N2012-2/11, Summary Updated.xls, July 19, 2012. <https://www.prc.gov/dockets/document/83663>. Available at <https://tinyurl.com/2mbe7en2>.

offices in communities that were 100 percent rural, the average annual cost was \$5,341.

Recommendations

While none of the bills proposed in Congress to address suspensions has become law, they provide suggestions for how to avoid de facto closings via suspensions and prevent large backlogs of unresolved suspensions.

For example, as suggested by S.3452, when a suspension reaches a certain age, the Commission could direct, or strongly encourage, the Postal Service to hold another round of public input, through written comments and meetings. This would ensure that a discontinuance is not based on out-of-date information, and the additional requirement might incentivize the Postal Service to avoid long-term suspensions in the future.

As suggested by S.1204, appeals to the Commission should be encouraged, even for offices under suspension. The Postal Service is supposed to advise communities of their right to appeal, but it has historically limited this notification to independent post offices, not stations and branches and not suspended offices, for which it claims an appeal would be premature. But nothing prevents customers from appealing suspensions, and in the past, two such appeals had important results. In its order on *Hacker Valley, West Virginia*, the Commission denied the Postal Service's motion to dismiss the appeal as premature and initiated a public inquiry to develop a

more complete record on emergency suspensions.⁴⁴ In its order on *Climax, Georgia*, the Commission agreed that an appeal was premature but directed the Postal Service to submit periodic status reports, and the post office was eventually reopened.⁴⁵ If even a few of the communities now experiencing a suspension were to file appeals, the results could be equally significant. It's not clear from the material shared with the Commission if, how, when, and where customers have been notified of their appeal rights. The Commission should ensure that the communities impacted by suspensions are aware of this right.⁴⁶

Finally, as suggested by H.R. 6355, the Commission should work with the Postal Service to create a suspension dashboard as described in the bill, along the lines of the prototype on savethepostoffice.com. As this prototype illustrates and as discussed above, there are many gaps in the data thus far provided by the Postal Service. It would therefore be useful if the Commission requested more information about the offices currently under suspension, including the following:

- a. A list of all the offices suspended at the end of FY 2021 showing the full address for each: street address, state and zip.
- b. For the suspensions since FY 2016, a list showing if and when a proposal to discontinue was posted, when a public meeting was held, and what stage has been reached in the discontinuance process.

⁴⁴ Docket No. A2009-1, Order on Appeal of Hacker Valley, West Virginia Post Office Closing, October 19, 2009. <https://www.prc.gov/docs/65/65247/Order%20319.pdf>

⁴⁵ Docket No. A2013-3, Order No. 1852, Climax GA, October 22, 2013. <https://www.prc.gov/Docs/88/88074/Order%20No.%201852.pdf>

⁴⁶ In comments submitted for the 2010 Public Inquiry on suspensions, the Public Representative recommended that the Commission treat suspensions older than ten months as discontinued and ripe for review and that future suspensions be treated as discontinuances unless there was a demonstrable emergency. See Initial Comments of the Public Representative, Docket No. PI2010-1, March 2, 2010, at 18. <https://www.prc.gov/docs/66/66983/PI2010%201%20PR%20Initial.pdf>

- c. As suggested by Rep. Axne's bill, a list showing the alternate access facilities, at least for the more recent suspensions.

The Postal Service may object that responding to such requests is too burdensome, but it has ready access to most, if not all, of this information in its Discontinuance Tracking System and other facility databases.⁴⁷ In any case, a more significant burden has fallen on the customers and communities whose post offices have been suspended. The Postal Service should at least be able to provide more information about the suspended offices.

Conclusion

The Commission is in the process of creating a dashboard for service performance.⁴⁸ In Order No. 6104 establishing the Public Inquiry on this dashboard, the Commission explains that "Congress has encouraged federal agencies to improve the quality and accessibility of their data. The Commission is required to comply with the OPEN Government Data Act, and the Commission looks to open data policies for guidance on transparency initiatives." The Commission also states that it is interested in hearing comments about "What, if any, other dashboards should the Commission develop that are consistent with the Commission's statutory authorities."⁴⁹

⁴⁷ The issues associated with gaining access to the Postal Service's records about suspensions and discontinuances were discussed by the Public Representative in the 2010 Public Inquiry. See Initial Comments of the Public Representative, Docket No. PI2010-1, March 2, 2010, at 12-13.

⁴⁸ The Postal Service is also required, by the Postal Service Reform Act of 2022, to develop and maintain a publicly available dashboard to track service performance. <https://www.congress.gov/bill/117th-congress/house-bill/3076>

⁴⁹ Docket No. PI2022-2, Order No. 6104, Notice and Order Providing an Opportunity to Comment on the Service Performance Dashboard, February 10, 2022, at 5. <https://www.prc.gov/docs/120/120889/Order%20No.%206104.pdf>

A suspension dashboard would clearly be consistent with the Commission's statutory authority, and it would be an excellent way to improve the quality and accessibility of suspension data and to respond to the OPEN Government Data Act.

An easily accessible and comprehensive suspension dashboard would provide individuals in communities impacted by a suspension with important information about the status of the suspension and/or discontinuance, the locations of alternative facilities, and the date and location for upcoming community meetings. By including elements of the administrative record, the dashboard would make it much easier for the public to access the kind of information that gets posted during a discontinuance review — information that is especially difficult to find when the post office has been suspended. The dashboard would also make the suspension information already being shared with Commission as part of the annual compliance review much more accessible. As it is, locating the key spreadsheets on the Commission's website is a challenge, and there are so many versions and corrections it's very difficult to know which is the most recent and reliable. The dashboard would ensure that there's an accurate, up-to-date listing of the impacted offices, and it would address the problem of inconsistencies between iterations of the suspension lists, the service alert list, the Find Locations website and news releases, as discussed above. The dashboard would also pre-empt the need for the Commission to respond to any ad-hoc information requests it receives from the public or from Congress about specific suspensions.

A suspension dashboard would increase transparency and accountability and encourage the Postal Service to expedite the resolution of the backlog of suspensions. As the Commission observed in 2011 concerning the first public inquiry into

suspensions, “While no specific action was taken as a result of the public inquiry docket, it has brought the issue to the attention of the Postal Service and the general public. As a result of the Commission's increased transparency and accountability of the Postal Service on this issue, the Postal Service now appears to be monitoring the practice of its local officials to ensure that the emergency suspension process is being used only as intended and that facilities that were previously suspended on a seemingly indefinite basis are reviewed in a timely manner for potential closure or other appropriate action.”⁵⁰

As we have seen over the past decade, the Postal Service has not improved its suspension practices to a satisfactory degree. Suspended offices are not being reviewed and resolved in a timely manner. More transparency and accountability are necessary. A dashboard won't solve all the problems, but it would help.

Respectfully submitted,

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⁵⁰ Postal Regulatory Commission, Section 701 Report: Analysis of the Postal Accountability and Enhancement Act of 2006, Sept. 22, 2011. https://www.prc.gov/sites/default/files/reports/701_report-092211.pdf