

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

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*In the Matter of:*

University Station  
Eugene, Oregon 97403  
(Steven Shapiro, Petitioner)

Docket No. A2011-4

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**NOTICE OF UNITED STATES POSTAL SERVICE**  
(December 7, 2010)

By means of Order No. 597 (November 23, 2010), the Postal Regulatory Commission docketed correspondence from a customer of the University Station in Eugene, Oregon, assigning PRC Docket No. A2011-4 as an appeal pursuant to 39 U.S.C. § 404(d).<sup>1</sup> That Order, at page 3, set December 7, 2010 as the date by which “[t]he Postal Service shall file the administrative record in this appeal, or otherwise file a responsive pleading to the appeal.” This pleading responds to that directive.

The Postal Service notes that it does not have a final administrative record supporting the discontinuance of University Station that complies with the standards applicable to a Post Office discontinuance, as the Commission likely expects. The discontinuance of University Station does not require an official administrative record conforming to Post Office discontinuance standards

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<sup>1</sup> University Station appears on the list of stations and branches identified for possible discontinuance in PRC Docket No. N2009-1. See [USPS-N2009-1-4 - Current List of Stations/Branches Identified As Candidates for Discontinuance Study Under Station/Branch Optimization/Consolidation Initiative \(Public Version\)](#) (January 29, 2010).

because University Station is not a Post Office and Commission jurisdiction under 39 U.S.C. § 404(d) does not attach.<sup>2</sup>

As the Commission is well aware, the Postal Service understands that the Commission lacks subject matter jurisdiction under 39 U.S.C. § 404(d) to review Postal Service decisions regarding the discontinuance of stations and branches. See *generally* Reply Brief of the United States Postal Service (December 16, 2009), section III (pp. 6-12), PRC Docket No. N2009-1; Comments of United States Postal Service Regarding Jurisdiction Under (Current) Section 404(d), PRC Docket No. A2010-3 (April 19, 2010).

The Postal Service could file a motion to dismiss the proceedings, and it would resemble that filed in the Hacker Valley case, PRC Docket No. A2009-1, supplemented by material from the pleadings cited in the previous paragraph. History suggests such an act would not be constructive.<sup>3</sup> In this matter, Petitioner fails to allege facts that constitute a condition precedent to any jurisdiction of the Commission under section 404. 39 U.S.C. § 404(d)(5).

In addition to the lack of jurisdiction arising from University Station's status as a station, the procedural requirements of 39 U.S.C. § 404(d) do not apply because the discontinuance of University Station does not qualify as a closure as envisioned by 39 U.S.C. § 404(d). As recognized in PRC Docket No. A2010-3, the section 404(d) procedural requirements do not apply where postal customers do not lose access to postal services due to the location of alternate retail

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<sup>2</sup> As a courtesy, the final determination affecting University Station appears as Exhibit 1.

<sup>3</sup> See, e.g., PRC Order No. 319 (October 19, 2009).

facilities in “close proximity” to the discontinued station. See Order No. 477, PRC Docket No. A2010-3 (June 22, 2010) at 7-8. The Commission recognized that 1.7 miles qualified as “a close proximity.” See *id.* Multiple postal retail facilities are located within 1.7 miles of University Station. See Exhibit 2 (printout from “Locate a Post Office” on [USPS.Com](http://USPS.Com)).<sup>4</sup> Accordingly, due to the close proximity of other postal facilities, the discontinuance of the University Station will not cause postal customers to lose access to postal services and the section 404(d) procedures do not apply.

The Commission may wish to consider whether these events should become part of docket PI2010-1. But the Postal Service understands that Commission assertion of jurisdiction at this time does not appear able to benefit the situation, postal customers, or the Postal Service.

Respectfully submitted,

UNITED STATES POSTAL SERVICE  
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December 7, 2010

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<sup>4</sup> This printout uses the term “Post Office” for retail units staffed by postal employees, thus including stations, branches and Post Offices.

# **EXHIBIT 1**

FINAL DETERMINATION TO CLOSE  
THE EUGENE UNIVERSITY, OR CLASSIFIED STATION  
AND CONTINUE TO PROVIDE  
RETAIL SERVICE AND POST OFFICE BOX  
SERVICE THROUGH THE EUGENE, OR POST OFFICE

DOCKET NUMBER 97403

## **I. RESPONSIVENESS TO COMMUNITY POSTAL NEEDS**

The Postal Service has determined to close the Eugene University, OR Classified Station and provide retail and post office box service at the Eugene, OR Main Post Office located 1.1 miles away. Customers have the option to obtain a post office box at the Eugene Post Office; therefore, they will be required to change their address.

Office service hours are determined by a workload analysis. A review of workload analysis reports indicated that workload at the University Classified Station has declined. The Postal Service feels that with this decline, combined with the fact that Hiron #1 Contract Postal Unit (CPU) is located only .5 miles away, Eugene Main Office is located 1.1 miles away, Hiron #8 CPU is located .9 miles away, and Southside Classified Station is located 2.4 miles away that a maximum degree of effective and regular service will be provided through the nearby retail locations.

The Eugene University Classified Station provides service 40 hours a week from 8:30 a.m. to 4:30 p.m., Monday through Friday, to 346 Post Office Box customers. Retail services include the sale of stamps, stamped paper, and money orders; special services such as Registered, Certified, Insured, Delivery Confirmation, Signature Confirmation, COD, and Express Mail; and the acceptance and dispatch of all classes of mail. Daily retail window transactions average 343. Office receipts for the last three years were: \$419,578 in FY-2007; \$421,826 in FY-2008 and \$379,598 in FY-2009. There are no permit mail customers.

When this final determination is implemented, delivery and retail services will be provided by the Eugene Post Office, an EAS-24 level office. Window service hours at the Eugene Post Office are from 8:30 a.m. to 5:30 p.m., Monday through Friday and 10 a.m. to 2 p.m. on Saturday. There are 653 Post Office boxes available.

On August 5, 2009 questionnaires were distributed to delivery customers of the Eugene University Station. Questionnaires were also available over the counter for retail customers at the Eugene University Station. Two hundred and forty-seven questionnaires were returned. Seventeen were favorable, 169 were unfavorable, and 61 expressed no opinion regarding the proposed alternate service.

Three Congressional inquiries were received on September 16, 2009.

The following postal concerns were expressed on the returned questionnaires, from customer letters, and from the congressional inquiries:

1. **Concern:** Customers wanted to know why the customer lines were so long at the Eugene Main Post Office.

**Response:** The Postal Service has a goal to keep customers wait time in line at five minutes or under. The Postal Service will continue to monitor window operations to try to alleviate any excessive wait in line to obtain services. Customers can also help the situation by trying to visit offices during non peak times, which are generally, when the window opens in the morning, during lunch and closing time. The Postal Service is certainly aware that customers lead busy lives and we have taken steps to make obtaining services and products easier. Stamps by Mail envelopes are available at your local office. Alternate locations to buy stamps are listed under "Locate a Post Office" at [www.usps.com](http://www.usps.com). Customers can also purchase stamps by phone at (800) 782-6724 or on-line at [www.usps.com](http://www.usps.com).

2. **Concern:** Customers complained about the parking lot at the Eugene Main Post Office.

**Response:** It is not necessary for customers to travel to the Eugene Main Office to obtain retail service. Most retail services are available at Hirons CPU which is located .5 miles away.

3. **Concern:** Customers expressed concern over a postal representative not being customer oriented.

**Response:** The Postal Service is a customer-oriented organization that works hard to get its customers and employees to share that orientation. We appreciate hearing from customers on how successful those efforts have been. In this case, the concerns and opinions of the University Classified Station customers are very important in determining the best alternate form of effective and regular service to offer the community.

4. **Concern:** Customers were concerned about having to make an address change on their bank checks and stationery.

**Response:** Customers will experience a change of address. Mail will be forwarded in accordance with postal regulations, and change of address forms are available from the Postal Service to assist customers in notifying correspondents of the change. Customers may deplete their current supply of checks and stationery and make the address corrections when ordering new supplies.

5. **Concern:** Customers were concerned about having to travel to another Post Office for services.

**Response:** Some customers will have to travel farther to obtain services. Since there are 5 retail units located within 1.1 miles of the Eugene University Station, the Postal Service feels that customers can combine trips for service with other errands that are completed during the day. Additionally, Stamps by Mail envelopes are available at your local office. Alternate locations to buy stamps are listed under "Locate a Post Office" at [www.usps.com](http://www.usps.com). Customers can also purchase stamps by phone at (800) 782-6724 or through the internet at [www.usps.com](http://www.usps.com).

6. **Concern:** Customers expressed concern that postal employees at the Eugene Main Post Office are rude.

**Response:** Employee courtesy is always a concern of postal managers. Postal employees receive periodic instructions regarding employee courtesy. We do not condone our employees execution of their duties in an unprofessional or discourteous manner. This concern will be conveyed to the postmaster by the Manager, Post Office Operations.

7. **Concern:** Customers were concerned about senior citizens.

**Response:** The Eugene Post Office will continue to provide the same services as the University Classified Station. The Eugene office will provide special assistance to senior citizens and those who face special challenges.

8. **Concern:** Customers said they would miss the special attention and assistance provided by the personnel at the University Classified Station.

**Response:** Courteous and helpful service will be provided by personnel at the Eugene Main Post Office. Special assistance will be provided as needed.

9. **Concern:** Customers stated the timing of the Postal Service's consideration of post office closures did not allow for student input as the majority of students were off campus for the summer.

**Response:** The Postal Service has recently announced that 413 retail stations and branches are under consideration for possible consolidation as a part of its Station and Branch Optimization and Consolidation (SBOC) Initiative. The announcement provides an update on a process that began earlier this summer to examine over 3,600 stations and branches in urban and suburban areas across the country, focusing on offices in close proximity to another, consolidations might be feasible, while maintaining customer access to postal services. A list of these offices can be found at <http://www.usps.com/communications/newsroom/stationbranchop.pdf>. This list will be updated periodically to reflect changes as they occur.

**Some advantages of this proposal are:**

1. Savings for the Postal Service contribute in the long run to stable postage rates and savings for customers.
2. The Eugene Main Post Office offers extended window service hours.
3. The Eugene Main Post Office has an automated postal center available for customer use.

**Some disadvantages to this proposal are:**

1. The loss of a retail outlet in the community.
2. A change in mailing address. The community name and the ZIP Code will continue to be used in the new address.
3. The Eugene Main Post Office may be farther for some customers, but closer for others. However, the unit is located in the community and is a convenient location for many customers.

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

**II. EFFECT ON COMMUNITY**

The University Classified Station is located in the incorporated city of Eugene. The area is administered politically by a mayor and council form of government. Police and fire protection is provided by the City of Eugene. The community is comprised of college students, those who commute to work at nearby communities and those who work in local businesses.

There are numerous stores, banks, schools and other public institutions, religious institutions, and businesses located in Eugene. Residents also travel to nearby communities for supplies and services.

Nonpostal services provided at University Station will be available at the Eugene Main Office

The following nonpostal concerns were expressed on the returned questionnaires, in customer letters and on the congressional inquiry:

1. **Concern:** Customers felt the Post Office should remain open since they paid taxes.

**Response:** The Postal Reorganization Act requires the Postal Service to operate on a breakeven basis. Most revenue is generated by the sale of postage, so when operational costs cannot be met, the Postal Service requests a rate increase. One advantage of this proposal is a savings for the Postal Service, which contributes in the long run to stable postage rates and savings for customers.

2. **Concern:** Customers were concerned about the loss of a gathering place and an information center.

**Response:** Residents may continue to meet informally, socialize, and share information at the other businesses, churches and residences in town.

Based on information the Postal Service obtained, it was determined that there has been minimal growth in the area in recent years. The Eugene Main Office is expected to be able to handle any future growth in the community.

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

### III. EFFECT ON EMPLOYEES

The clerks will be reassigned to the Eugene Main Office and maintain bidding status within that office.

### IV. ECONOMIC SAVINGS

The Postal Service estimates annual savings of \$130,095 with a breakdown as follows:

Clerk Salary (1 PS-7 & 1 PS-6, Minimum)	\$82,086
Fringe Benefits @33.5%	27,498
Rental Costs, Plus Utilities	<u>27,000</u>
Total Annual Costs	\$136,584
Less Cost of Replacement Service	<u>-6,489</u>
Total Annual Savings	\$130,095

### V. OTHER FACTORS

The Postal Service has identified no other factors for consideration.

### VI. SUMMARY

The Postal Service has determined to close the Eugene University Station and provide retail and delivery service through Eugene Main Office, located approximately 1.1 miles away.

A review of workload analysis reports indicated that workload at the University Classified Station has declined. This decline, combined with the fact that Hirons #1 CPU is located only .5 miles away, Eugene Main Office is located 1.1 miles away, Hirons #8 CPU is located .9 miles away, and Southside Classified Station is located 2.4 miles away.

The clerks will be reassigned to the Eugene Main Office and maintain bidding status within that office. No other employee will be adversely affected. Workload and customer use has declined.

The Eugene University Station provides 40 hours of window service per week to 346 customers. Daily retail window transactions average 343. There are no permit mailer customers.

The Eugene Main Office will continue to provide effective and regular service to the community. There will be a loss of a retail outlet in the area and customers will experience a change of address. The Postal Service will save an estimated \$130,095 annually. A disadvantage to some may be in traveling to Eugene Main Office to transact business. However, it is not necessary to visit a retail outlet to conduct most postal transactions.

Taking all available information into consideration, the Postal Service has determined that this final determination is warranted.

**VII. NOTICES**

Notify customers of the permanent discontinuance of the Eugene University Station and advise them of the hours of operation and services available at the Eugene Main Office and other alternative locations within a 5 mile radius.



Dean J. Granholm  
Vice President  
Delivery and Post Office Operations

08/10/10  
Date

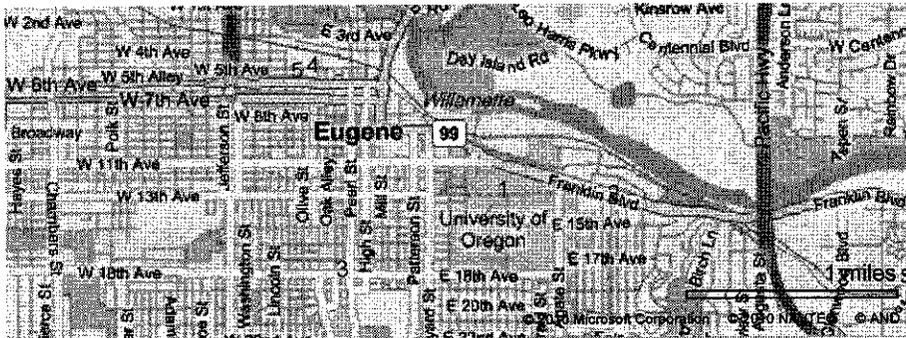
# **EXHIBIT 2**



# Post Office™ Locations

[PRINT](#) | [BACK](#)

## Post Office™ Locations in the EUGENE, OR area



- |   |  |   |
|---|--|---|
| <p><b>1</b> <b>Post Office™</b><br/><b>Location -</b><br/><b>UNIVERSITY</b><br/><b>STATION</b><br/>1222 E 13TH AVE<br/>EUGENE, OR 97403-<br/>9701<br/>(800) ASK-USPS<br/>(800) 275-8777<br/>(541) 341-3692</p> <p style="border: 1px solid black; padding: 2px;">0.0 mi</p> | <p><b>Business Hours</b><br/>Mon-Fri<br/>8:30am-4:30pm<br/>Sat-Sun<br/>closed</p>                        | <p><b>Services</b><br/><a href="#">PO Boxes Online</a></p> <p>Service hours may vary. Please check link for business hours.</p> |
| <p><b>2</b> <b>Post Office™</b><br/><b>Location - CPU</b><br/><b>HIRONS INC #1</b><br/>1950 FRANKLIN BLVD<br/>EUGENE, OR 97403-<br/>2068<br/>(800) ASK-USPS<br/>(800) 275-8777<br/>(541) 344-5260</p> <p style="border: 1px solid black; padding: 2px;">0.5 mi</p>          | <p><b>Business Hours</b><br/>Mon-Fri<br/>9:00am-4:30pm<br/>Sat<br/>9:00am-12:30pm<br/>Sun<br/>closed</p> |   |
| <p><b>3</b> <b>Post Office™</b><br/><b>Location - CPU</b><br/><b>HIRONS INC #8</b><br/>185 E 18TH AVE<br/>EUGENE, OR 97401-<br/>4107<br/>(800) ASK-USPS<br/>(800) 275-8777<br/>(541) 344-4832</p> <p style="border: 1px solid black; padding: 2px;">0.9 mi</p>              | <p><b>Business Hours</b><br/>Mon-Fri<br/>9:00am-5:00pm<br/>Sat<br/>9:00am-12:00pm<br/>Sun<br/>closed</p> |   |

**4 Post Office™**  
**Location -**  
**EUGENE**  
**DOWNTOWN BOX**  
**SECTION**  
 520 WILLAMETTE ST  
 EUGENE, OR 97401-2627  
 (800) ASK-USPS  
 (800) 275-8777  
 (541) 341-3618  
1.1 mi

**Business Hours**  
 Mon-Fri 8:30am-5:30pm  
 Sat 10:00am-2:00pm  
 Sun closed

**Services**  
[PO Boxes Online](#)  
[Automated Postal Centers®](#)  
 Service hours may vary. Please check link for business hours.

**5 Post Office™**  
**Location -**  
**EUGENE MAIN**  
**OFC CARRIER**  
**ANX**  
 575 OLIVE ST  
 EUGENE, OR 97401-2669  
 (800) ASK-USPS  
 (800) 275-8777  
 (541) 341-3639  
1.1 mi

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