

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, DC 20268-0001

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POSTAL REGULATORY  
COMMISSION  
OFFICE OF THE SECRETARY

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Delaware Station Post Office, )  
Albany, New York 12209 )  
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Docket No. A2011-1

DELAWARE AREA NEIGHBORHOOD ASSOCIATION MOTION  
FOR LEAVE TO FILE AN UPDATED DECLARATION

(December 21, 2010)

The Delaware Area Neighborhood Association (DANA) files this Motion for Leave to File an Updated Declaration, in order to update the December 16, 2010 declaration that was attached with the December 16, 2010 Joint Motion for Leave to File a Declaration to Clarify Facts Surrounding Delaware Area Neighborhood Association Freedom of Information Act Request.

The reason for this request to file an updated declaration is that, on December 18, 2010, a member of DANA received the Postal Service's response to the October 18, 2010 Freedom of Information Act (FOIA) request that was discussed in the December 16, 2010 declaration. The attached December 21, 2010 updated declaration of Susan J. DuBois describes the FOIA response and states that the lack of the Administrative Record is still prejudicial to DANA's pursuit of this appeal.

This motion is being made by DANA alone, rather than being a joint motion by DANA and the Public Representative, because the Public Representative is out of the office for most of this week. Waiting to try to prepare a joint motion would delay the motion.

Respectfully submitted,

*Susan J. DuBois*

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Susan J. DuBois, Treasurer  
Delaware Area Neighborhood  
Association

Post Office Box 9085  
Albany, New York 12209

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, DC 20268-0001

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Delaware Station Post Office, )  
Albany, New York 12209 )  
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Docket No. A2011-1

UPDATED DECLARATION OF SUSAN J. DUBOIS IN SUPPORT OF  
DELAWARE AREA NEIGHBORHOOD ASSOCIATION MOTION FOR  
LEAVE TO FILE AN UPDATED DECLARATION

(December 21, 2010)

1. My name is Susan J. DuBois, and I am the Treasurer of the Delaware Area Neighborhood Association (DANA). I make this declaration in support of the Delaware Area Neighborhood Association's Motion for Leave to File an Updated Declaration. This declaration updates my December 16, 2010 declaration to reflect receipt of documents through the Freedom of Information Act (FOIA), many of which documents contain deletions. This updated declaration was prepared by amending paragraphs 1, 2 and 13 of my December 16, 2010 declaration and adding paragraphs 14 through 19.

2. As I outline in the facts below, a Freedom of Information Act (FOIA) request was made for a copy of any and all written information and any record in its entirety pertaining to the process of determining whether or not to close Delaware Station and including the eventual decision to close it. The FOIA request was made on

October 18, 2010, one day before the October 19, 2010 postmark date of DANA's Post Office Closing Appeal. As of December 16, 2010, the requested information had not been received.

3. The statements herein are made to the best of my knowledge, information and belief.

4. In the Reply of the United States Postal Service in Response to Delaware Area Neighborhood Association Motion to Compel Postal Service to File Complete Administrative Record, the Postal Service incorrectly suggests that DANA delayed filing a FOIA request for the complete Administrative Record in this case.<sup>1</sup>

5. As the attached November 17, 2010 letter (Attachment A) from the Postal Service states, the Postal Service received a FOIA request from Albany Council Member Catherine Fahey. Ms. Fahey is also a member of DANA. The request was for a copy of any and all written information and any record in its entirety pertaining to the process of determining whether or not to close Delaware Station and including the eventual decision to close it. The Postal Service's letter acknowledges that Ms. Fahey's request was dated October 18, 2010.<sup>2</sup>

6. The letter also states that the Postal Service found that the request raised "unusual circumstances" and that as such, the Postal Service required additional time to fulfill the request. The Postal Service expected to contact Ms. Fahey to fulfill

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<sup>1</sup> Reply of the United States Postal Service in Response to Delaware Area Neighborhood Association Motion to Compel Postal Service to File Complete Administrative Record, December 14, 2010 at 2 n.5.

<sup>2</sup> On or about November 26 or 27, 2010, I received from Ms. Fahey a copy of the Postal Service's November 17, 2010 letter to her. Ms. Fahey had mailed it to me on November 24, 2010, as indicated by the postmark on her envelope.

the request "before or immediately after December 16, 2010."

7. I filed DANA's appeal in this case on October 19, 2010, one day after Ms. Fahey's FOIA request was sent to the Postal Service.

8. When I realized that the Postal Service did not file the complete Administrative Record regarding its decision to close the Delaware Station Post Office in this appeal, and instead filed a selected excerpt, I called Postal Service Counsel Kenneth Hollies on November 12, 2010 and left a message for him with his Co-counsel James Mecone, to call me back. Mr. Hollies called me back on November 15, 2010.

9. When I spoke with Mr. Hollies, he stated that the Postal Service was not willing to file the complete Administrative Record in this case, but he would be willing to treat my request as a FOIA request for the materials. I said I wanted to think about it before asking him to treat my request as a FOIA request. He provided the address of the Postal Service's FOIA office.

10. I did not ask Mr. Hollies to treat my informal request for the Administrative Record in this case as a FOIA request because it was my understanding, based upon my discussions and e-mail communications with Ms. Fahey, that she had already made a FOIA request.

11. At the time of my conversation with Mr. Hollies, I did not think it was useful to have two simultaneous FOIA requests outstanding on the same topic. I also was concerned that an additional request might somehow delay the Postal Service's response to the request Ms. Fahey had already made. At the time of my conversation with Mr. Hollies, I did not have specific information about the dates involved in Ms. Fahey's request and I did not feel it was a good idea to have a

discussion about such a request with incomplete information.

12. I also did not believe that DANA had anything additional to gain by making a second FOIA request when Ms. Fahey's request was already in progress.

13. As of December 16, 2010, I had not received the Postal Service's Administrative Record in this case. I contacted Ms. Fahey on December 15, 2010 and she told me that she had not yet received a response to her FOIA request as of that date.

14. Late in the afternoon of December 18, 2010, Ms. Fahey gave me an envelope of documents she had received from the Postal Service, and told me that she had received them earlier that day. The documents consisted of a three-page transmittal letter to Ms. Fahey from Gayla Gorman, of the Postal Service, dated December 15, 2010, an Official Record Index listing 44 items, and copies of those items (some of which contain deletions). A copy of Ms. Gorman's December 15, 2010 letter and the Official Record Index are attached (Attachment B).

15. Ms. Gorman's December 15, 2010 letter states that the Postal Service found 332 pages of record material responsive to Ms. Fahey's request. The letter transmitted 332 pages, of which 101 pages were released in their entirety and 231 pages contained deletions. The letter cited FOIA exemptions 2, 3, 5 and 6 concerning the deletions, and 39 USC sections 410(c)(1), (2) and 412 as additional citations related to exemption 3.

16. At numerous places in the documents Ms. Fahey received, items that appear to be data concerning the level of activity, income, costs and staffing at Delaware Station and other post offices are blanked out. In addition to blanking out names and

addresses of persons who commented, in a few cases the organizational affiliation and organizational role of the commenter are also blanked out. Item No. 37 (Alternative Service Cost Analysis) and Item No. 41 (Wait Time in Line Data) are entirely blank. In Item No. 28 (WOS Reports), the visible text appears to be a form but the entries in the form are deleted, with "(b)(3): 39 USC 410(c)(2)" noted in the blank areas. I understand this notation to mean that the information was withheld under FOIA exemption 3 and 39 USC 410(c)(2).

17. Item No. 43 is described as Proposal and is dated 11/24/2009 (Item No. 43, at 6). In this document, several sections are blanked out and contain notations of "(b)(5)," "(b)(3): 39 USC 412," or "(b)(3): 39 USC 410(c)(2)." A copy of Item No. 43 is attached (Attachment C).

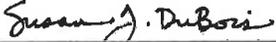
18. The documents provided to Ms. Fahey by the Postal Service appear to be missing information of kinds that are available in other official records for closures that can be reviewed on the Postal Regulatory Commission's web site. The two records I looked at for comparison were those for the Rentiesville, OK Post Office (Docket No. A2010-5), and the Buhl, PA Classified Station (Public Version) which was filed as a library reference on July 2, 2009 in Docket No. N2009-1. Although I do not know the scope or contents of the record the Postal Regulatory Commission would have received from the Postal Service in response to the Commission's October 22, 2010 order, I believe that the FOIA response that was sent to Ms. Fahey provided less information than would have been in the full record.

19. I continue to believe that DANA is prejudiced in pursuing this appeal as a result of not having received the Administrative Record.

I declare under penalty of perjury that the foregoing is true and correct.

Docket No. A2011-1

Executed on December 21, 2010.

  
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Susan J. DuBois  
Treasurer  
Delaware Area Neighborhood  
Association

# Attachment A

## RECORDS OFFICE



November 17, 2010

Catherine Fahey  
City of Albany Common Council  
32 Lawnridge Ave  
Albany, NY 12208

RE: FOIA Case No. 2011-FPRO-00048

Dear Ms. Fahey:

This responds to your Freedom of Information Act (FOIA) request dated October 18, 2010 in which you seek access to Postal Service records.

We have received your check and are processing your request.

The FOIA, 5 USC §552, allows agencies 20 working days (exclusive of Saturdays, Sundays and federal holidays) in which to process requests. In unusual circumstances, agencies may qualify for further extensions, and may request a modified FOIA request and/or time frame for response (5 USC §552(a)(6)(B)). Unusual circumstances are defined to include requests that involve voluminous and/or dispersed records, or requests that require consultation with other agencies having a substantial interest in requested records.

Your request qualifies for "unusual circumstances," and involves voluminous and dispersed records.

Because your request involves voluminous and dispersed records we are extending the response period ten working days (title 39 CFR 265.7(b)(4)(iii)(B)).

You will be contacted before or immediately after December 16, 2010,

Sincerely,

A handwritten signature in cursive script, appearing to read "Gayla Gorman".

Gayla Gorman  
Consumer Research Analyst

## Attachment B



December 15, 2010

Catherine Fahey  
City of Albany Common Council  
32 Lawnridge Ave  
Albany, NY 12208-3112

RE: FOIA Case No. 2011-FPRO-00048

Dear Ms. Fahey:

This responds to your Freedom of Information Act (FOIA) request dated October 18, 2010, in which you seek access to Postal Service records related to any and all written information pertaining to the Postal Service's decision-making process of the Delaware Station closure study. Based upon your request, Albany District conducted the search and provided the records you sought to this office.

We have found 332 pages of record material responsive to your request. Enclosed are 332 pages, of which 101 pages are released in their entirety, and 231 pages contain deletions pursuant to FOIA Exemptions 2, 3 (39 U.S.C. §§ 410(c)(1), (2), & § 412), 5 and 6. Additional information may be found on the Postal Regulatory Commission (PRC) website using docket number A-2011-1 under the docket search tab. The PRC website can be found at <http://www.prc.gov/prc-pages/default.aspx>

Congress enacted the FOIA, 5 U.S.C. § 552, to permit a "policy of broad disclosure of government documents in order to ensure 'an informed citizenry, vital to the functioning of a democratic society.'" In enacting the statute, Congress also recognized that "legitimate governmental and private interests could be harmed by release of certain types of information." Accordingly, Congress crafted nine exemptions to FOIA.

Exemption 2 concerns records related solely to the internal personnel rules and practices of an agency. This exemption may apply to predominantly internal information about matters of a relatively trivial nature or to internal matters the disclosure of which would risk circumvention of the law. It permits the nondisclosure of data such as file numbers, mail routing stamps, initials, data processing notations, brief references to prior communications, and other similar administrative markings, including personnel directories, including phone numbers and e-mail addresses.

FOIA Exemption 3 provides that agencies may withhold records that are exempted from disclosure by another statute that "(A) requires that the matters be withheld from the public in such a manner as to leave no discretion on the issue, or (B) establishes particular criteria for withholding or refers to particular types of matters to be withheld." We consider that 39 U.S.C. §§ 410(c)(2) operates both independently and as exempting statute within the scope of Exemption 3 of the FOIA. While the Postal Service is generally subject to the requirements imposed by the FOIA, 39 U.S.C. § 410(b)(1), subsection (c)(2) of section 410 provides, however, that subsection (b)(1) does not require the disclosure of "information of a

commercial nature, including trade secrets, whether or not obtained from a person outside the Postal Service, which under good business practice would not be publicly disclosed.” The Postal Service is “an independent establishment of the executive branch” of the government, created by the Postal Reorganization Act, (PRA), 39 U.S.C. §§ 101, et seq., and directed to conduct its operations in accordance with sound business principles.

In determining whether Exemption 3 applies, the statutory term “good business practice” is interpreted with reference to normal practices of private businesses. Private sector delivery firms are not governed by the FOIA, and are not required to respond to requests from members of the public for information pertaining to their customers. Therefore, if the Postal Service were to release the requested information pursuant to the FOIA, it would be releasing information that would not likely be disclosed by private sector delivery firms. The information requested here would likewise not be disclosed by private delivery firms in the normal course of their business, and therefore is withheld from disclosure. Information that is determined to be in full or in part, commercially sensitive, proprietary business information that the Postal Service does not disclose to the public is therefore protected by FOIA Exemption 3 and 39 U.S.C. §§ 410(c)(2).

Furthermore, section 410(c)(1) of Title 39, U.S. Code, permits the withholding of the name or address, past or present, of any Postal Service customer. Therefore, the names and addresses of Postal Service customers have been redacted. Also, 39 U.S.C. § 412(a) provides that except as specifically provided by law, no officer or employee of the Postal Service shall make available to the public by any means or for any purpose any mailing or other list of names or addresses (past or present) of postal patrons or other persons. We consider that 39 U.S.C. § 410(c)(1) and 39 U.S.C. § 412(a) operate independently and as exempting statutes within the scope of Exemption 3 of the FOIA.

Exemption 5 permits the withholding of inter-agency or intra-agency letters or memorandums that would not be available by law to a party other than an agency in litigation with the U.S. Postal Service. The purpose of this exemption is to encourage open, frank discussion on matters of policy between agency personnel; to protect against premature disclosure of proposed policies before they are finally adopted; and to protect against public confusion that might result from disclosure of reasons and rationales that were not in fact ultimately the grounds for an agency’s action. The withheld information consists, in part, of draft documents, memorandums, and email communications among agency employees all of which are deliberative in nature. These documents contain opinions, analysis, advice, and recommendations to be used in the decision-making process.

FOIA Exemption 6 permits agencies to withhold “personnel and medical files and similar files the disclosure of which would constitute a clearly unwarranted invasion of personal privacy.” 5 U.S.C. § 552(b)(6). Any records which contain information concerning particular individuals may qualify for the exemption’s protection. Therefore, the names and addresses of customers are “files” within the meaning of the exemption and have been redacted.

In determining whether to release records that may be protected by Exemption 6, the agency must balance the privacy interests of the individuals involved against the public interest, if any, that would be served by disclosure. The only public interest to be weighed is the extent to which disclosure would serve the “core purpose” of the FOIA, which is to contribute significantly to public understanding of the operations or activities of the

government, or, in other words, to shed light on the conduct of government agencies. We do not consider that there is a public interest in the disclosure of the redacted and withheld information sufficient to outweigh the privacy interests of the individuals involved. Since disclosure of such information would not contribute significantly to public understanding of the operations or activities of the government, and because of the significant privacy interests implicated, this office has redacted and withheld the names of customers from the responsive records.

You have the right to appeal this partial denial of your request by writing to the General Counsel, U.S. Postal Service, Washington, DC 20260-1100, within 30 days of the date of this letter. The letter of appeal should include statements concerning this response, the reasons why it is believed to be erroneous, and the relief sought, along with copies of the original request, this letter, and any other related correspondence.

Sincerely,

A handwritten signature in cursive script that reads "Gayla Gorman".

Gayla Gorman  
Consumer Research Analyst

Enclosures

Official Record Index  
Delaware Station, New York 12209-9998

<u>Item No.</u>	<u>Description</u>	<u>Date Entered into Record</u>
1.	Request/approval to study for discontinuance	07/08/09
2.	PS Form 4920	07/15/09
3.	Delivery Statistics Zip Code Summary	06/18/09
4.	Local Post Office Locations	07/07/09
5.	ZIP Code Demographic Report	07/10/09
6.	WOS Reports	07/10/09
7.	Facilities Database System Information-Real Estate	07/13/09
8.	Letter to Station Manager-Requesting PO Box Information	07/16/09
9.	Carrier Delivery Statistics Summary Report	07/20/09
10.	Customer Service Variance	07/21/09
11.	FLASH Report	07/31/09
12.	Maps	08/04/09
13.	Post Office Closing or Consolidation Proposal	08/05/09
14.	Times Union Metroland Article	08/12/09
15.	Station and Branch Optimization Concept Briefing Sheet	08/13/09
16.	Vehicle Available by Household - Albany Census Tracts	08/13/09
17.	Station/Branch Optimization Concept Briefing Sheet	08/13/09
18.	E-Mail Maureen Marion re Albany City Common Council	08/16/09
19.	Memo to VP NE Area, Mgr. NE Area, Mgr. Windsor Facilities	08/31/09
20.	E-Mail Maureen Marion Albany Times Union Article	08/11/09
21.	E-Mail Maureen Marion Delaware Area Neighborhood Association	08/12/09

<u>Item No.</u>	<u>Description</u>	<u>Date Entered into Record</u>
22.	Albany District Newsbreak	09/02/09
23.	E-Mail Maureen Marion re: customer letter	09/08/09
24.	Letter to Postal Inspectors-Vandalism Reports	09/30/09
25.	Letter to PO Box Customers	no date
26.	Maps and Photographs	10/29/09
27.	39 US Code Section 101	11/01/09
28.	WOS Reports	11/02/09
29.	CSN Residential/Small Business NPA Index Trend Report	11/02/09
30.	Maps within 10 Mile Radius of Delaware Station	11/03/09
31.	Article Albany Times Union Newspaper	11/04/09
32.	Community Meeting Roster	11/04/09
33.	Petition From Delaware Station Customers	11/04/09
34.	E-Mail Maureen Marion re: Community Meeting	11/05/09
35.	Classified Station and Branch Checklist	11/24/09
36.	Community Survey Sheet	11/24/09
37.	Alternate Service Cost Analysis	11/24/09
38.	Return on Investment Worksheet	11/24/09
39.	Community Meeting Analysis	11/24/09
40.	Letters to Customers on Community Meeting	11/24/09
41.	Wait Time in Line Data	11/24/09
42.	FY 09 TOE Data	11/24/09
43.	Proposal	11/24/09
44.	Transmittal to Vice President, Delivery and Post Office Operations, From District Manager, Customer Service and Sales	11/24/09

## Attachment C

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ISSUED  
PAGE

PROPOSAL TO CLOSE  
THE DELAWARE CLASSIFIED STATION  
AND PROVIDE POST OFFICE BOX SERVICE  
THROUGH THE HUDSON AVE (MAIN) CLASSIFIED STATION

DOCKET NUMBER 12209

## I. RESPONSIVENESS TO COMMUNITY POSTAL NEEDS

ITEM NO.  
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The Postal Service is proposing to consolidate the Delaware, NY Classified Station and provide PO Box delivery service administered by the Hudson Avenue Post Office, located 2.7 miles away. Those customers that opt for street delivery will be served by Carrier Annex.

Service will be provided to mailboxes installed by customers on the carrier's line of travel.

Office service hours are determined by a workload analysis which includes the number of deliveries and revenue. A workload analysis conducted in July 2009 indicated that customer usage and workload at the Delaware Classified Station had declined. This decline and the fact that there are 7 retail units located 3 miles from the Delaware Classified Station. The Postal Service feels that a maximum degree of effective and regular service will be provided through P.O. Box/GD-Another Office at Hudson Ave (Main), located 2.7 miles away.

The Delaware Finance Station, an EAS-17 level, provides service 33.75 hours a week from 08:45 AM-01:00 PM, 02:00 PM-04:30 PM, Monday through Friday, and 09:00 AM-12:00 PM on Saturday to 154 post office box, general delivery and intermediate rural HCR customers. Retail services include the sale of stamps, stamped paper, and money orders; special services such as registered, certified, insured, COD, and Express Mail; and the acceptance and dispatch of all classes of mail. Daily retail window transactions average (b)(5)

(b)(5) There are zero permit mailers and zero postage meter customers. Administrative responsibility for these customers will be transferred to the Hudson Avenue Post Office, located 2.7 miles away.

When this final determination is implemented, delivery and retail services will be provided by P.O. Box/GD-Another Office delivery emanating from the Hudson Avenue Post Office, an EAS-17 level office located 2.7 miles away. Window service hours at Hudson Avenue are from 07:00 AM-05:30 PM, Monday through Friday, and 07:00 AM-12:00 PM on Saturday. There are 248 post office boxes available.

On 11/4/2009, representatives from the Postal Service were available at the Elks Lodge, located at 25 S. Allen St., Albany to answer questions and provide information to customers. Thirty-eight customers attended the meeting.

A petition supporting the retention of the Delaware Post Office was received on 11/04/2009 with 864 signatures.

### Some advantages to the final determination are:

1. Carrier delivery service is beneficial to some senior citizens, the handicapped, and working people since customers will no longer need to travel to the post office to pick up

their mail.

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2. The carrier provides retail services, alleviating the need to go to the post office. Stamps by Mail order forms are provided for customer convenience.

3. Customers opting for carrier service will have 24-hour access to their mail.

4. A savings for the Postal Service, which contributes in the long run to stable postage rates and savings for customers.

5. Customers opting for carrier service will no longer have to pay post office box fees.

6. Saves time and energy for customers who drive to the post office to pick up mail.

**Some disadvantages to the final determination are:**

1. The loss of a retail outlet in the community and a postmaster position in the community.

2. Meeting the carrier at the mailbox to transact business. However, it is not necessary to be present to conduct most postal transactions.

3. A change in mailing address. (for those customers that opt to discontinue PO Box service) The community name will continue to be used in the new address. However, a carrier route address will be assigned, and the ZIP Code will remain 12209.

4. Customers who want post office box service at the Hudson Ave Post Office can retain the PO Box number and no address change will be necessary. Customers will experience a post office box fee increase. However, free service is available through carrier delivery.

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

**II. EFFECT ON COMMUNITY**

Delaware is located in the incorporated city of Albany. The area is administered politically by the city of Albany. Police and fire protection is provided by Albany Police Department and Albany Fire Department. The community is comprised of 9,772 citizens.

within zone 12209. The Postal Service has 12 postal facilities throughout the city. There are also 30 Stamps on Consignment locations within a 3 mile radius of Delaware Station.

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(b)(3):39 USC 412

The following nonpostal concerns were expressed at the community meeting and from customer letters:

Concern: Customers expressed concern for loss of community identity.

Response: A community's identity derives from the interest and vitality of its residents and their use of its name. The Postal Service is helping to preserve community identity by continuing the use of the Delaware Station ZIP Code in addresses and in the National Five-Digit ZIP Code and Post Office Directory.

Concern: Customers felt the loss of a post office would have a detrimental effect on the business community.

Response: Businesses generally require regular and effective postal services, and these will always be provided to the Delaware community.

Concern: Customers felt the loss of the Delaware post office would discourage new businesses from coming to the community.

Response: Again, businesses generally require regular and effective postal services, and these will always be provided in the Delaware community. There is no indication that the business community will be adversely affected. Most new businesses moving to the community do not depend on the location of a post office, but on the provision of effective and regular postal services.

Concern: Customers were concerned about growth in the community.

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

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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.

To help preserve community identity, the community's name and the ZIP Code will be retained in the mailing address. It will continue to be listed in the National Five-Digit ZIP Code and Post Office Directory.

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

### III. EFFECT ON EMPLOYEES

The clerk will be reassigned.

### IV. ECONOMIC SAVINGS

The Postal Service estimates an annual savings of (b)(5) with a breakdown as follows:

Clerk Salary (PS-6, Step A) \$40122  
Fringe Benefits @33.5% \$13440.87  
Rental Costs, Including Utilities \$ (b)(3):39 USC 410 (c)(2)

Total Annual Costs \$ (b)(5)  
Less Cost of Replacement Service \$

Total Annual Savings (b)(5)

(b)(5) incurred for installation of PO Box unit.

### V. OTHER FACTORS

The Postal Service has identified no other factors for consideration.

**VII. NOTICES**

**A. Support Materials: This is a proposal. It is not a final determination to close this classified station.**

(b)(6)



Edward F. Phelan Jr.  
Albany District Manager

11/24/2009

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