

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, DC 20268

Postal Regulatory Commission  
Office of the Chief Admin. Officer

DEC 27 2010

In the Matter of:

Eugene Post Office University Station, Oregon, 97403:  
Post Office State ZIP Code

Docket No: A2011-4

Steven Shapiro, Petitioner(s)

PARTICIPANT STATEMENT

1. Petitioner(s) are appealing the Postal Service's Final Determination concerning the Eugene Post Office University Station post office. The Final Determination was posted October 21, 2010

2. In accordance with applicable law, 39 U.S.C. § 404(b)(5), the Petitioner(s) request the Postal Regulatory Commission to review the Postal Service's determination on the basis of the record before the Postal Service in the making of the determination.

3. Petitioners: Please set out below the reasons why you believe the Postal Service's Final Determination should be reversed and returned to the Postal Service for further consideration. (See pages 1-2 of the Instructions for an outline of the kinds of reasons the law requires us to consider.) Please be as specific as possible. Please continue on additional paper if you need more space and attach the additional page(s) to this form.

---

I believe that the Post Office Final Determination should be reversed and returned to the Postal Service for further consideration for the following reasons:

1. Title 39, 241.3 requires a 60 day public comment period. The notice by the USPS to postal customers is dated August 5, 2009. The cut off period for response is dated August 21, 2009. The USPS did not dispute this contention in its response to the PRC. By limiting public comment to such a shortened period during which most members of the University of Oregon community are not on campus, the USPS neither followed the letter nor the intent of the law to adequately gauge the community's response to the proposed closure.
2. The USPS relied upon the proximity of other postal facilities. I believe that the facts in the determination are true, but they do not prove what the Postal Service says it proves.
  - a. The survey period was during a time that school was not in session, and limited to postal box customers and persons actively doing business at the counter during this time period.

Specifically addressing Concern #5:

- i. When school is in session, the University of Oregon is an autonomous community of about 30,000 people. Parking is virtually nonexistent on campus. Therefore, the residents of this unique community cannot hop into their car and drive the 1.1 miles to the nearest USPS facility during business hours. Even the .5 mile walk to the nearest Contract Postal Unit is burdensome on a busy day with a bulky package. The Contract Unit is neither set up handle an increase of customer volume nor to deal with any complicated mailings. The vast majority of customers are students, a heavy percentage of whom are international students. They need to be instructed by experienced clerks in minute detail how to prepare and mail packages, including international mailings and expedited mailing options. This is not going to happen at a Contract Postal Unit.
- ii. The Post Office assumes that a large part of the business of this post office can be handled electronically (such as purchasing stamps). In my experience waiting in line, and according to the clerks, stamp purchase is a minimal part of this Post Office's daily business. A majority of the business is providing assistance with and facilitating the mailing of national and international packages.

Specifically addressing Concern #9

- i. The answer provided by the Post Office does not acknowledge the concern or address it with an adequate response.
- b. According to the clerks who work in the station:

According to the USPS records, the University Station actually had an increase of volume from fiscal year 2007 to fiscal year 2008. The station then experienced an 11% decrease in fiscal year 2009. This amounted to a \$40,000 decrease of revenue from fiscal year 2007. The USPS listed revenue as \$379,578 and annual costs at \$136,584. These numbers do not appear to justify the loss of service to so many customers.

Finally, the USPS took the employee salaries and benefits plus rents, subtracted \$6489 and determined that the USPS will save \$130,095 annually from the closure. The USPS has had a long time hiring freeze on craft employees. It will therefore not save on the hiring of other employees. It is also contractually not allowed to lay off 2 craft employees. It is therefore indeterminable what if any savings in employee salary and benefits will occur. There is also no determination by the USPS as to how much of the \$379,578 revenue will be lost to the USPS if the University Station is closed. Once again, due to the unique community served by the University Station, a large portion of the customers will not be able to endure the minor inconvenience of driving an extra 1.1 miles to the nearest postal station. It is reasonable to assume that the USPS will lose revenue far in excess of its \$27,000 annual rental costs. The USPS failed to address this issue.

- c. Under the "Advantages of this proposal" section, #2 and #3 are not correct for the following reasons:
  - i. The extended window service hours of the main post office are inconsequential to the student community that can not get there.
  - ii. The automated postal center has limited hours of availability and can not assist with complicated and international mailing.
- d. Under the "Disadvantages of this proposal" section #3 is not correct because very few of the University community live downtown or travel downtown in the course of a business day.
- e. Under section II. Effect on Community, the concerns lists and the responses are curious. The statement about people needing the Post Office as a gathering place does not make sense. People do not meet at a Post Office to socialize. They go to a Post Office to transact business.

Approximately 1,000 petitions were gathered by members of the University of Oregon community documenting the hardship that the closing of this station would cause. These petitions were gathered in roughly a 48 hour time period during a time when school was in session and notice of the intended closure was posted with signs large enough for pedestrians to notice. They were submitted by mail for attachment to this docket.

This demonstrates that the conclusion by the Post Office that closing this facility will not adversely affect the community is incorrect.

- 3. The Post Office argues that this location is not a true Post Office, but is instead a "Station" that is not subject to PRC jurisdiction.

This office is not a "station" to this community, but rather a Post Office in the sense that there are no other practical alternatives. If they close this office, the majority of some 30,000 people in this community will not have any practical access to postal services at all.

I urge the PRC to take up jurisdiction of the case. In prior decisions, the PRC has decided with the USPS that it does not have jurisdiction over stations and branches, but is limited to the closure of Post Offices. The difference being a station acts as a satellite to a Post Office. I am trying to make the case that based on the unique make up of the community, this is a Post Office rather than a station or branch and the PRC should view it that way.

I strongly urge the PRC to suspend the closure/consolidation of the University Station Post Office pending an open and transparent process that adequately addresses the needs of all Postal patrons who frequent the facility.

 12.22.2010  
\_\_\_\_\_  
Steven Shapiro, 12-22-2010

August 5, 2009

Dear Postal Customer:

Changes in consumer preference and recession-related declines in mail volume have reduced U.S. Postal Service revenues. Operation of the Postal Service is paid for by postage and fees paid by our customers. The Postal Service receives no operational subsidy from taxes. Current economic conditions require that we review all postal operations for opportunities to streamline processes and provide service more efficiently.

As the postal manager responsible for all offices in your area, I would like your opinion concerning a possible change in the way your postal service is provided. A review of the business activities of the University Station revealed that the office workload has declined. This reduced workload and the fact that we have the Eugene Main Office Station located within a 1.1 miles and the Southside Station located within 1.9 mile radius suggests that the continuation of the University Station may not be warranted.

If you are a post office box customer, you have the option of post office box delivery at the Main Office Station, located at 520 Willamette Street, Eugene or Southside Station at 30 E 33<sup>rd</sup>, Eugene, or you may receive carrier delivery at your residence. Full retail service hours at Eugene Main Office are from 8:30 am to 5:30 pm, Monday-Friday. Saturday hours are 10:am to 2: pm. The lobby is open 5:00am to 7:00 pm Monday-Saturday. Southside Station is open 8:30 am to 6:00 pm, Monday-Friday. Saturday 10am-2:00pm. The lobby is open 24 hours a Day for customer convenience. Postal services are also available at [usps.com](http://usps.com).

The Postal Service operates to serve our customers. We value your opinions during this review process. Please complete the enclosed questionnaire and return with your comments by August 21, 2009.

Thank you for your assistance.

Sincerely,

Paul Bastinelli, Postmaster  
520 Willamette Street  
Eugene OR 97401-9998