

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

In the matter of:

Penobscot Finance Station
aka Penobscot Post Office
(Barbara Sherwood, Petitioner)

Docket No. A2011-5

CONCLUDING WRITTEN COMMENTS
OF THE PETITIONER, BARBARA SHERWOOD
(February 15, 2011)

I'm appealing to the Postal Regulatory Commission (the PRC) to return the entire matter of the Penobscot Finance Station to the United States Postal Service (the USPS) for two purposes: 1) to reverse their Final Determination to close the Penobscot Finance Station and 2) since the Postal Service closed the Penobscot Station between Wednesday, November 3, 2010 (the date on which the first of 2 Closure Notices was posted) and 5 p.m. on Friday, January 14, 2011 (the 2nd and Special Notice to extend window services until Jan. 14, 2011 being posted on Wednesday, December 29, 2010), to re-open it as, in the first place, it should not have been discontinued, closed, or consolidated with the Main Fort St. P.O. and the Gratiot Branch, forcing customers to use these and other postal facilities including the Renaissance Center (RenCen) Finance Station. The Penobscot P.O. boxholders had between Wed., Nov. 3, 2010 and Fri., Dec. 31, 2010 at noon to relocate their box (after which time, the Postal Service would no longer service the boxes) and window customers had between Wed., Nov. 3rd, 2010 and Fri., Jan. 14, 2011 to obtain window services.

The Penobscot Building Finance Station was perfectly located geographically in the center of downtown Detroit's Financial District and should not have been closed so that visitors to the area and those who work there could take care of a multitude of errands at one time (banking, mailing (USPS, FedEx, and UPS), government, legal, and retail business). What kind of city has a Financial District with no Post Office? Not the city Detroit always was, needs to continue to be, and strives to become.

I deduced and it was confirmed by the Supervisor of the Gratiot Branch, the Penobscot Finance Station, and the Renaissance Finance Station, Willie Todd Williams, that a "Finance Station" in Detroit is a post office located in a magnificent skyscraper (and is therefore, a safe and beautiful post office in a safe and beautiful building in a safe and beautiful neighborhood) which does not have carriers assigned to it to deliver to the tenants in the office building where located or to the surrounding neighborhood, but offers window services (including passport applications) and P.O. boxes for rent. In Detroit, the tenants in a building with a Finance Station have a mailroom with a mailbox for each suite and carriers from a nearby larger P.O. deliver the mail, in the case of the RenCen and Penobscot Finance Stations, the Main Fort St. Post Office. Detroit had 3 Finance Stations, the Renaissance (RenCen) Finance Station on the East Riverfront of the Detroit River, the Penobscot Finance Station in the Financial District to the north of the East Riverfront, and the Fisher Building Finance Station in the New Center area north of the Finan-

cial District, the Theatre and Sports District, Brush Park, and Midtown with the Detroit Medical Center, the University Cultural Center with Wayne State University, the College for Creative Studies, the Main Library, and all our wonderful museums and cultural non-profits including the Detroit Institute of Arts, the Detroit Historical Museum, the Charles H. Wright Museum of African American History, Museum of Contemporary Art Detroit, the Detroit Science Center, The Children's Museum, the Scarab Club (for artists), the Hellenic Museum of Michigan, the International Institute of Detroit with immigration attorneys to assist the foreign born with legal and social service needs and an Ethnic Education Department to honor and preserve the art, dance, song, food, cultural attire, crafts, traditions, and holidays of the ethnic groups who have made Detroit their home, and the umbrella organization for Midtown: the University Cultural Center Association, as well as the New Center itself which includes the historic and gorgeous Fisher Building and Henry Ford Hospital. The Fisher Building Finance Station is on the Endangered P.O. List. Finance Stations in Detroit represent the crème de la crème of postal operations in an urban setting and should not be closed for financial reasons, but rather kept open if at all possible as part of the essential cultural, business, and service character of the city.

It's my understanding that Senator Tom Carper is trying to pass legislation which will enable the Postal Service to close stations, branches, and community post offices for one reason: they're not making a profit, ignoring the public service mission of the Postal Service and 2) that it's against current law to close a postal facility open to the public for financial reasons only (read the January 24, 2011 article by Jennifer Levitz (who spoke to me on the phone on Dec. 15, 2010 after she read my Dec. 1 & 2 appeal to the PRC on the prc.gov website, Docket A2011-5) in the Wall Street Journal entitled "Postal Service Eyes Closing Thousands of Post Offices" (2000+ beginning in March 2011), [http://online.wsj.com/article/SB10001424052748704881304576094000352599050.html?..or Google, Wall Street Journal, Jan. 24, 2011, Jennifer Levitz, "Postal Service Eyes Closing Thousands of Post Offices."](http://online.wsj.com/article/SB10001424052748704881304576094000352599050.html?..or Google, Wall Street Journal, Jan. 24, 2011, Jennifer Levitz,) If it is currently illegal to close a Finance Station (or other postal facilities open to the public) for financial reasons only, I haven't been able to determine any reason other than financial for consolidating, discontinuing, or closing the Penobscot Finance Station or for putting any of the facilities on the Endangered P.O. List.

The PRC should have subject matter jurisdiction over all postal facilities open to the public (stations, branches, community post offices, etc.); perhaps if the PRC wishes, all that serve the public. The Postal Service, U.S. Congress, the Federal Courts, the Postal Regulatory Commission, and the public will hopefully one day agree that a Proposal to Close should be posted inviting public response to specific contact persons in Washington, D. C. and locally a year before any Final Determination to Close or Final Determination to Stay Open is posted, whether the facility is a station, branch, or post office, since closure negatively affects service to the public whatever name is attached to the facility by the Postal Service.

Dean Granholm, Vice President, Delivery and Post Office Operations, did not instruct his attorneys to respond to my request through the PRC to SUSPEND the CLOSURE of the Penobscot Finance Station, pending the outcome of the PRC Review which the PRC ordered the Postal Service to do by December 16, 2010

(see the December 10, 2010 PRC filing on this Docket A2011-5 concluding with the PRC-determined Procedural Schedule with deadlines for the petitioner, the USPS, and the PRC). The closure took place 1/4 of the way through the PRC Appeal Process and as I've said previously on this Docket, the law must be changed so that upon acceptance by the PRC of a petitioner's appeal, any closure, discontinuance, or consolidation of any station, branch, or post office will be **AUTOMATICALLY SUSPENDED** until at least a point in time **AFTER** the **COMPLETION** of the PRC REVIEW.

The Final Determination to close the Penobscot Finance Station was based on financial considerations, but the net savings to the Postal Service were greatly exaggerated in the Discontinuance Study of the Penobscot P.O. See the December 21, 2010 filing of the USPS on Docket A2011-5 which consists of a 3-page cover letter by USPS attorneys, Exhibit 1 (the 4-page Discontinuance Study of the Penobscot P.O. by Dean Granholm) and Exhibit 2 (nearby post offices according to a website). Refer to the top of P. 4 Discontinuance Study signed by Dean Granholm under IV. ECONOMIC SAVINGS (attached to these comments). It turns out that there were, in reality, 2 one-time closing costs: \$11,174. for "replacement service" and \$7,059 for "building modifications and the buyout of the existing lease" or a total of \$18,233. I understand from the Supervisor of the Gratiot Branch and the Penobscot and Renaissance Finance Stations that Suite 100, Penobscot Building, had to be restored to an approximation of its original floor plan to make it suitable for a future tenant and the mailroom for tenants' mailboxes plus an adjacent area for the carriers to work in constructed so that the tenants could continue to have their mail delivered to their mailboxes in the mailroom by Main Fort Street carriers even though the Penobscot Finance Station is closed just as was the case when the Penobscot Station was open. Also, the 3 clerks at the Penobscot Finance Station (paygrade PS-6 or higher) were transferred to the Gratiot Branch where the Supervisor referred to above has his office and their salaries and fringe benefits totaling \$163,145 were, naturally, transferred with them, thus adding to the cost of doing business at the Gratiot Branch and of no net savings to the Postal Service. By closing the Penobscot Station, the cost of 3 clerks was deducted from the cost of doing business in the Penobscot Bldg., but their transfer to the Gratiot Branch added to the cost of doing business at the Gratiot Branch.

Also, once the lease expired between the Postal Service and the Penobscot Management Company, Finsilver/Friedman, the USPS has been paying rent on a month to month basis. Even without knowing the total amount of month to month rent, and using only the figures on P. 4 Discontinuance Study of October 21, 2010 signed by Dean Granholm, the only predictable annual savings of closing the Penobscot Finance Station would be:

Maintenance	\$30,845.	
Rent & Utilities	48,780	
Inter-Station		
Transportation	18,278	
	<u>\$97,903</u>	not as stated: \$249,874 for 2012 forward and \$242,815 for 2011 (implied).

While the expenditures as listed may be accurate, the Postal Service has **GREATLY EXAGGERATED THE SAVINGS OF CLOSURE AND HAS NOT PROVEN THEIR CLAIM.**

I recently obtained from Carol Zarek a copy of the attached Questionnaire

referred to on P. 1 of the Discontinuance Study of Oct. 21, 2010. The cover letter of Nov. 6, 2010 signed by Lloyd E. Wesley, Jr., Detroit Postmaster, is addressed to the Penobscot P.O. Boxholders. The attached 2-page questionnaire could be filled out by any Postal Service customer. With the 3 pages came a pre-addressed envelope (to be mailed to Carol Zarek, USPS Detroit Review Coordinator) which was also postage paid by the USPS. I was not able to determine if this questionnaire was delivered by a Main Fort St. P.O. carrier to the tenants' mailboxes. It WAS placed in the rented boxes by the Penobscot Finance Station clerks and distributed to window customers. The reason I could not recall having filled out any questionnaire given to me by a Penobscot Finance Station clerk is that, by reviewing my check register for Oct., Nov. & Dec. 2009, and Jan. 2010, I realized that I had made purchases at the Penobscot P.O. in Oct. and Dec. 09 and Jan. 2010, BUT NOT IN NOVEMBER 2009 when for a 2-week period, hardly an accurate sampling of customer opposition to closing, the Questionnaire had been available, the 2 weeks being Nov. 6, 2009 through Nov. 20, 09.

The law needs to mandate that a PROPOSAL TO CLOSE NOTICE be posted and remain posted FOR A YEAR or for such time as a FINAL DETERMINATION TO CLOSE OR NOT TO CLOSE NOTICE REPLACES IT. Also, a questionnaire cannot really be designed to elicit customer reaction to a Proposal to Close. The only way to determine public opposition is with a PROPOSAL TO CLOSE NOTICE with contact information to in this case, Dean Granholm in Washington, D.C. and to Carol Zarek in Detroit. Copies should be run off for window customers and a copy should be put in every Boxholder's P.O. Box and the carriers for the tenants have copies for tenant mailboxes. In Detroit, we have 2 widely available free weekly publications: the "New Monitor" and "Metro Times" where Proposals to Close should be printed. The radio, TV evening news channels, and the internet should inform the public of a PROPOSAL TO CLOSE a Finance Station, Branch, or Community P.O. and ask the public to please respond to the proposal, giving contact information.

Dean Granholm refers to letters from customers but does not indicate to whom they were addressed and does not mention a petition with Penobscot Building tenants and customers' signatures which the manager of one of the Penobscot businesses mentioned to me. The analysis lacks substantial evidence that there was really no opposition to speak of to the proposal to close the Penobscot Station.

It's my considered opinion that the closure of the Penobscot station was an abuse of discretion on the part of the Postal Service as was the decision NOT to respond at all and specifically, not to respond by December 16, 2010 on Docket A2011-5 to the PRC deadline regarding my request to SUSPEND CLOSURE pending the outcome of the PRC Review. I do, however, appreciate TOTALLY the decision of the USPS attorneys: Daniel J. Foucheaux, Jr. Chief Counsel, Pricing and Product Support, and Kenneth N. Hollies, and James M. Mecone not to file a motion to dismiss my appeal on technical grounds and to carefully explain pertinent details of law applicable to the subject matter of my appeal with the Postal Regulatory Commission.

I've learned so much about the interaction between the U.S. Congress, the USPS, the PRC, and 2 Postal Service Unions, but have only skimmed the surface.

I'm deeply grateful to the Detroit Postal Service executives: Carol Zarek

(Review Coordinator in charge of closing the Penobscot Station (which she never wanted to do) who patiently answered my numerous questions and was always willing to send me the faxes I needed for my PRC reports), Willie Todd Williams (the Supervisor of 3 postal facilities in my general area: the Gratiot Branch which delivers my home mail and where the 3 Penobscot Station clerks transferred, and the Penobscot and Renaissance Center Finance Stations, who always gave me his undivided attention and knowingly and cheerfully answered all my questions whenever I could catch up to him on the phone), and Eileen (a most informative Assistant to Lloyd E. Wesley, Jr., Detroit Postmaster).

I enjoyed making phone contact again with Ann Gail, the owner of the former Gail's Office Supply, the key retail establishment in the Penobscot Building for almost 75 years (I treasure my store of items purchased there), and talking in person and on the phone to John Hamilton, the Manager for years of Gail's Office Supply in the Penobscot (Gail's had stores in Detroit at the Penobscot Building, in Wyandotte, in Birmingham, and at one time, also Bloomfield Hills) and since the exit of Gail's, the Manager of Evidence Express in the Concourse (lower level) of the Penobscot Building. Their insights and information enhanced my PRC filings.

A retired social worker friend of mine, Raymond Warner, an expert internet researcher, kept me busy learning more and more with articles he found on the internet which he knew I had to read:

- 1) an article by Tony Pecinovsky dated July 9, 2010 entitled "Deficit Hawks Take Aim at Postal Service" (<http://peoplesworld.org/deficit-hawks-take-aim-at-postal-service/>) in which the author cites The American Postal Workers' Union and their view that it's the December 2006 Federal Postal Accountability and Enhancement Act which requires the Postal Service to pre-fund 75 years of retiree health care benefits within a 10 year period, a crippling requirement that no government department or agency or private business or non-profit has to meet, which is the main cause of the Postal Service's financial troubles, as much as increased electronic mail and an economy in crisis or sluggish recovery are contributing factors. The Postal Service has been beginning each fiscal year \$5 billion dollars in debt in order to meet this unreasonable goal. If relieved of this ongoing obligation, they would have had a \$3.7 billion dollar surplus (at the time of the article, July 2010) or a surplus of more than \$1 billion dollars for the previous 3 fiscal years. After reading this stunning article, I phoned the National Association of Letter Carriers whose President, Frederic Rolando, I had watched on CNN interviewed by Candy Crowley. Brandon Thompson in the Legislative Department left me a message that the American Postal Workers' Union is the LARGEST Union in his field and the National Association of Letter Carriers, the 2nd largest. He referred me to their NALC website and offered any assistance I might need;
- 2) the article in the Wall Street Journal by Jennifer Levitz which I referred to on P. 2 of this report.

The over-the-phone-research-librarians, whom I consider the BEST in the English language at the Henry Ford Centennial Library in Dearborn, MI on Michigan Avenue across from the Ford Motor Company World Headquarters, were of total assistance, as always, in reading the prc.gov website, Docket A2011-5 during the December holidays when the PRC was on vacation.

And then, of course, the WONDERFUL staff of the Postal Regulatory Commission, beginning with the 5 Commissioners. Had it not been that Ruth Goldway, Chairwoman of the Postal Regulatory Commission, appeared as a guest on C-SPAN's "Washington Journal" at least twice in 2010 when I happened to turn to the program (and was SO FAVORABLY IMPRESSED WITH HER), I would never have heard of the PRC or been able to write to her on November 6, 2010 after reading the November 3, 2010 NOTICE OF CLOSURE (effective Jan. 3, 2011) on the glass entrance to Suite 100, the Penobscot Building Station, which led to a surprising and welcome phone call the day before Thanksgiving from the 1st of 2 contact persons assigned to me at the PRC, Annie Kennedy, offering me the opportunity to file an Appeal to try to keep the Penobscot Post Office, OPEN, a fabulous suggestion! Annie Kennedy, a superb Consumer Relations Specialist (who also functioned as a troubleshooter throughout the Appeal Process) referred to the ever-encouraging attorney, Michael Ravnitsky, whenever I asked Annie a legal question. On December 10, 2010 (when the Secretary of the PRC, Shoshana M. Grove, formally accepted my appeal and filed the Procedural Schedule for Docket A2011-5), my 2nd of 2 guides, attorney Cassandra Hicks, with her compassionate personality and splendid legal knowledge, became my contact person for the remainder of the Appeal. Cassandra has been of enormous assistance to me, both when she's in her office and away, answering countless questions and arranging for faxes to be sent to me:

- 1) the USPS Inspector General's September 30, 2010 Reports with which the USPS Administration fortunately agrees and is working with the U.S. Senate to implement the suggestions of the Inspector General's staff which could save the Postal Service \$142.4 billion dollars (since the USPS Inspector General found that the USPS was OVERFUNDING the Civil Service Retirement Fund, the Federal Employees' Retirement System, and the Retiree Health Benefits Fund) and could enable the Postal Service to no longer be required to pre-fund the Retiree Health Benefits Fund an average of \$5.6 billion dollars a year, could make possible the prefunding of pensions and retirees' health benefits at benchmarked levels (the USPS pensions consistent with the Standard & Poors 500 companies and the USPS retiree health care benefits consistent with the Fortune 1000 companies), could pay existing retirees' health insurance premiums from the retiree health fund, and could pay off its debt to the U.S. Department of the Treasury;
- 2) pages from the U.S. Code establishing the Postal Regulatory Commission.

I am totally grateful, as well, to both Joyce and Sylvia in the website division who accepted my faxed reports and filed them immediately on prc.gov, Docket A2011-5. I do not have a computer and received a waiver to mail and permission to fax. My thanks, also, to Lynn Norwood, who at Cassandra Hick's request, faxed me the very important USPS Inspector General's Reports.

The whole Appeal Process at the Postal Regulatory Commission would have been impossible without the amazing grace of the Management Team at Elmwood Towers Apartments where I've lived for the past 12 years, specifically, Gilda Cox, the Site Manager, and La'Shawne Tyler, Assistant Manager, who both sent and received faxes, faxes, and more faxes necessary for my participation as the petitioner on Docket A2011-5, prc.gov.

With regard to my revised version dated January 11, 2011 of my January 10th filing, the following errata: on P. 2, in addition to the famous restaurant,

the Caucus Club, and Evidence Express (blank legal documents and office supplies), a branch of Wesley Berry Florists, a shoeshine parlor called V.I.P., and a new retail business I have yet to explore can be found in the Concourse of the Penobscot Building. Also, the luggage shop that was once on the 1st floor of the Penobscot Building was Cadillac Luggage, NOT London Luggage. The London Luggage Shop, in business in Detroit for many years, is thankfully, alive and well at 5955 Woodward Avenue next to the Wayne State University Press (and was never located in the Penobscot Building). On P. 7, I intended to type pro se, but mistakenly typed: per se. End of my mea culpa.

Whatever the outcome of my appeal to the Postal Regulatory Commission to keep the Penobscot Finance Station (Penobscot Post Office) open and now that it's closed, re-open it, I've had a fascinating time working together with so many splendid people on this project (prc.gov, Docket A2011-5), all of whom want the United States Postal Service to correct its financial and legal problems (with as little dislocation to its customers, both urban and rural, as possible) and continue to be our national letter and package delivery service, come hell and high water, on which and on whom we all depend!

Respectfully submitted,

Barbara K. Sherwood

Barbara K. Sherwood
1325 Chene St., Apt. 617
Detroit, Michigan 48207-3853

ph.: 313-392-0136
with voice mail
after 7 rings

text: 7 pages plus

attachments: total: 9 pages

6 pages (cover labeled Exhibit 1, title page, & 4 page report:
Dean Granholm's Discontinuance Study dated Oct. 21, 2010
as part of a complete USPS filing on Docket A2011-5,
prc.gov, Dec. 21, 2010)

and a 3-page Questionnaire with cover letter, Detroit Postmaster General,
Lloyd Wesley, Jr., dated Nov. 6, 2010

P. 1 of 9 attachments, petitioner's filing,
Feb. 15, 2011

EXHIBIT 1

(excerpt from the USPS filing on prc.gov, Docket A2011-5
of December 21, 2010 (the complete filing is on the Docket
under the date)

P. 2 of 9 attachments of petitioner's filing,
Feb. 15, 2011

FINAL DETERMINATION TO CLOSE
THE PENOBSCOT, MICHIGAN FINANCE STATION
AND CONTINUE TO PROVIDE
RETAIL AND POST OFFICE BOX
SERVICE THROUGH THE GEORGE W YOUNG, MICHIGAN MAIN POST OFFICE

DOCKET NUMBER 48231

I. RESPONSIVENESS TO COMMUNITY POSTAL NEEDS

The Postal Service has determined to close the Penobscot Finance Classified Station and provide post office box delivery service at the George W. Young, MI Main Post Office, located 1 mile away. The post office box customers will be able to retain their address if they move to the George W. Young Main Post Office. If they choose to rent a post office box at another location or receive carrier delivery, they will have to change their address. Customers that receive carrier delivery out of the George W. Young Main Post Office will retain the same delivery. The only change will be that they will have to go to the George W. Young Main Post Office for packages and accountable items that the carrier was unable to deliver.

Retail transactions have declined at the Penobscot Finance Station by approximately 16% since fiscal year 2007, while revenue has declined by approximately 16% for the same period. The Postal Service feels that regular and effective service will continue to be provided through the George W. Young Main Post Office.

The Penobscot Finance Station provides service 42 ½ hours a week from 8:30 a.m. to 5:00 p.m., Monday through Friday, and closed on Saturday. 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 436. Office receipts for the last three years were: \$687,533 in FY-2007; \$651,701 in FY-2008 and \$577,905 in FY-2009. There are no permit mail customers.

When this final determination is implemented, delivery and retail services will be provided by the George W. Young Main Post Office. All operations will be moved to this location. Window service hours at George W. Young Main Post Office are from 8:00 a.m. to 12 midnight, Monday through Saturday. There are 234 Post Office boxes available. The District will be installing PO Box carousels to accommodate all 568 Penobscot PO Box holders. The Penobscot PO Box holders will not experience a change in their address or zip code.

On November 6, 2009 questionnaires were distributed to delivery customers of the Penobscot Finance Station. Questionnaires were also available over the counter for retail customers at the Penobscot Finance Station. One hundred and fifty questionnaires were returned. Sixteen were favorable, 51 were unfavorable, and 83 expressed no opinion regarding the proposed alternate service.

The following postal concerns were expressed on the returned questionnaires and from customer letters.

1. **Concern:** Customers expressed concern that the George W. Young Main Post Office was not convenient for the customers living in the Penobscot community.

Response: The Postal Service is proposing to place new post office box carousels into the George W. Young Main Post Office Station, since it has room to accommodate more boxes. We understand that the distance may cause an inconvenience for some customers. Customers also have the option of city delivery service to their residence.

2. **Concern:** Customers were concerned about having to travel to another post office for service.

Response: Some customers will have to travel farther to obtain services. The Postal Service feels that customers can combine trips for service with other errands that are completed during the day. Customers also have the option of carrier delivery which would eliminate trips to the post office to obtain their mail. Customers can also purchase stamps by phone at (800) 782-6724 or through the internet at www.usps.com.

3. **Concern:** Customers asked why their post office was being discontinued while others were retained.

Response: Post offices are reviewed on a case-by-case basis. When there is a vacancy in a small office, it is customary to conduct a study of the business activity and investigate the feasibility of providing service by alternate means.

4. **Concern:** Customers were concerned about a change of address.

Response: Customers choosing post office box service at the George W. Young Main Post Office will not experience a change of address. Customers choosing city delivery service will experience an address change. 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. An example of the change is shown below.

Present Address:

JOHN DOE
PO BOX 1
Detroit, MI 48231

Proposed Address:

JOHN DOE
100 MAIN ST
Detroit, MI 48232

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.
2. Stamps by Mail order forms are provided for customer convenience for customer's receiving city delivery service.
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. City delivery services 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.
2. A possible change in mailing address. Customers choosing post office box service at the George W. Young Main Post Office will not experience a change of address. Customers choosing city delivery service will experience an address change. 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.
3. Customers needing services from a post office will have to travel to another location for those services. The George W. Young Main Post Office is located 1 mile away.

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

Penobscot Finance Station is located in the Incorporated City of Detroit, MI. The area is administered politically by the City of Detroit. Police and fire protection, are provided by the City of Detroit. The community is comprised retirees/senior citizens and those who commute to work at nearby communities, and those who work in local businesses.

There are 553 stores, banks, religious institutions, and businesses located around the Penobscot Finance Station. Residents travel to nearby communities for supplies and services.

The following non-postal concerns were expressed on the returned questionnaires and from customer letters:

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

Response: Carrier service is beneficial to many senior citizens and those who face special challenges because the carrier can provide delivery. Customers do not have to make a special trip to the post office for service. Special provisions are made for hardship cases or special customer needs. To request an exception for hardship delivery, customers may contact the Detroit postmaster for more information.

2. **Concern:** Customers expressed concern for those customers with disabilities who are not able to go to George W. Young Main Post Office to pick up their mail.

Response: Customers are not required to travel to another post office to receive mail. In hardship cases, delivery can be made to the home of a customer. Changes in the type of delivery are considered where service by existing methods would impose an extreme physical hardship for an individual customer. Any request for a change in delivery method must be submitted in writing to the Detroit postmaster.

3. **Concern:** Customers were concerned about mail security.

Response: Verification with the Postal Inspection Service revealed no recent reports of mail theft or vandalism in the area. Customers may place a lock on their mailboxes. The mailbox must have a slot large enough to accommodate the customer's normal daily mail volume. The Postal Service does not open mailboxes which are locked and does not accept keys for this purpose.

Based on information the Postal Service obtained, it was determined that there has been minimal growth in the area in recent years. However, service through the George W. Young Main Post Office, is expected to be able to handle any future growth in the community.

To help preserve community identity, the community's name and address will be retained in the mailing address. No change of address will be required for customers choosing post office box service at the George W. Young Main Post Office.

Based on 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 George W. Young Main Post Office and maintain bidding status within that office. No other employee will be adversely affected.

IV. ECONOMIC SAVINGS

The Postal Service estimates annual savings of \$249,874 with a breakdown as follows:

Clerk Salary (PS-6, Minimum)	\$122,208
Fringe Benefits @33.5%	40,937
Maintenance	30,845
Rental Costs, Plus Utilities	48,780
Inter-Station Transportation	+18,278
Total Annual Costs	261,048
Less Cost of Replacement Service	-11,174
Total Annual Savings	\$249,874

A one time expense of \$7,069 will be incurred for building modifications and the buyout of the existing lease.

V. OTHER FACTORS

The Postal Service has identified no other factors for consideration.

VI. SUMMARY

The Postal Service has determined to close the Penobscot Finance Station and provide retail and delivery service through George W. Young Main Post Office, located approximately 1 mile away. Post office box customers will have the option of retaining their post office box and number at the George W. Young Main Post Office, or closing the box and receiving carrier delivery service. Present carrier delivery customers will receive the same service with the exception of traveling to pick up accountable mail and parcels that the carrier was unable to deliver.

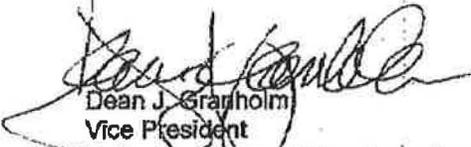
The Penobscot Finance Station provides 42 ½ hours of window service per week to 568 customers. Daily retail window transactions average 436. There are no permit mailers.

Post office box and retail service at the Penobscot Finance Station will continue to provide effective and regular service. There will be a loss of a retail outlet in the area. However, delivery and retail services will be available at the George W. Young Main Post Office. To help preserve identity, the name and ZIP Code will be retained in the mailing address. The Postal Service will save an estimated \$249,874 annually. A disadvantage to some may be in the extra travel to obtain services.

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

VII. NOTICES

Notify customers of the permanent discontinuance of the Penobscot Finance Station and advise them of the hours of operation and services available at the George W. Young Main Post Office.


Dean J. Granholm
Vice President
Delivery and Post Office Operations

(Dean J. Granholm)

10/21/10

(October 21, 2010)

Date

P. 7 of 9 attachments, petitioner's filing,
2-15-2011

POSTMASTER DETROIT
DETROIT DISTRICT



Penobscot Finance Branch
November 6, 2009

Dear Valued Post Office Box Customer:

Changes in consumer preference and recession-related declines in mail volume have reduced U.S. Postal Service revenues. Current economic conditions require that we review all postal operations for opportunities to streamline processes and provide service more efficiently. A review of the business activities of the Penobscot Branch revealed that the office workload has declined. The recommended change is to close the Penobscot Finance Branch and relocate the retail and PO Box Service. I would like your opinion concerning this change in how your postal services are provided.

If you wish to continue PO Box Service, we would provide service to you at the George W Young (GWY) Main Post Office which is located at 1401 W Fort St. Detroit MI 48233; less than 1 mile from your current location. Full retail window service hours at GWY Main are daily, 6:00 am to 12:00 Midnight, Sunday through Saturday. The box lobby is accessible 24 Hours, 7 Days a week. The Main office also offers an Automated Postal Center (APC) accessible 24 hours a day, where using a debit or credit card, you may perform nearly all of the same transactions you would at the retail window.

There are three options for mail that is addressed to your Post Office Box:

1. You may relocate your Post Office Box service to the location above. With this option, your PO Box number WILL NOT change.
2. You may close your Post Office Box at Penobscot Finance and have your mail delivered to a street address. We will provide a refund for the unused portion of your Post Office Service. With this option, any mail pickup of parcel and signature items would move to the post office of your mail delivery zone.
3. You may search on your own for PO Box Service at an alternate Post Office location. With this option, your PO Box number WILL change. You may search for available Post Office Box service in other locations either by ZIP Code or address, go to www.usps.com; click on Locate a Post Office; in the Options drop-down menu (under "What are you trying to locate?", click on PO Boxes Available; type in a Zip Code or an address in the available boxes; and then hit the "Search" button.

Please complete the enclosed survey and return it in the enclosed pre-addressed envelope no later than Friday, November 20, 2009

Thank you for your assistance and we apologize for any inconvenience this may cause you. If you have questions you may contact Carol Zarek, Review Coordinator, at 313-226-8723.

Lloyd E. Wesley, Jr.
Postmaster, Detroit
United States Postal Service
1401 W Fort St 10th FL
Detroit MI 48233-9998

SAVE: C:\BTL\RW\SURVEY

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Postal Customer Questionnaire

1. Please check the appropriate box to indicate whether you used the post office for any of the following:

Postal Services:	Daily	Weekly	Monthly	Never
a. Buy stamps	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Mail letters	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Mail Packages	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Picking up Post Office Box mail	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Pick up mail from General Delivery	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f. Buy Postal Money Orders	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g. Purchased Certified Mail™, Registered Mail™, Insured Mail, Delivery Confirmation™, or Signature Confirmation™	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
h. Send Express Mail®	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
i. Buying stamp-collecting products	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Other Postal services:

a. Enter permit mailings Yes No

Nonpostal Services:

a. Picking up government forms (such as tax forms) Yes No

b. Assisting senior citizens, persons with disabilities, etc. Yes No

If yes, please explain: _____

2. Do you pass another Post Office during business hours while traveling to or from work, shopping or for personal needs?

Yes No

If yes, which offices: _____



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3. If you receive carrier delivery, there will be no change to your delivery service -- proceed to question 4.
If you currently receive post office box service, complete this section. How do you think carrier route delivery service will compare to your Post Office Box service?

Better Just as Good No Opinion Worse

Please explain: _____

4. For which of the following do you leave your community? (Check all that apply.) Where do you go to obtain these services?

- Shopping _____
- Personal needs _____
- Banking _____
- Employment _____
- Social needs _____

5. Do you currently use local businesses in the community?

Yes No

If yes, would you continue to use them if the Post Office is discontinued?

Yes No

Please indicate below which option you would consider if a change in service is implemented:

- Option 1 Move current PO Box service to the new designated location
- Option 2 Receive carrier delivery at my residence
- Option 3 Search on my own for PO Box service at alternate Post Office location

Other: Please explain _____

Name: _____
(please print your name)

Address: _____

Telephone number: _____ Date: _____

Please add any additional comments on a separate piece of paper and attach it to this form.
Thank you for taking the time to complete this questionnaire.