

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

In the Matter of:

Lincoln Branch
Mansfield, OH 44905
(Board of Madison Township
Trustees, Petitioner)

Docket No. A2011-7

NOTICE OF UNITED STATES POSTAL SERVICE
(February 23, 2011)

By means of Order No. 669 (February 9, 2011), the Postal Regulatory Commission docketed correspondence from a board of trustees regarding the discontinuance of the Lincoln Branch, Mansfield, OH 44905, assigning PRC Docket No. A2011-7 as an appeal pursuant to 39 U.S.C. § 404(d).¹ That Order, at page 3, set February 23, 2011 as the date by which “[t]he Postal Service shall file the administrative record regarding this appeal.” This pleading responds to that directive.

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

¹ The Lincoln Branch 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 the Lincoln Branch is not a Post Office, and Commission jurisdiction under 39 U.S.C. § 404(d) does not attach.²

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.³ 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 the Lincoln Branch's status as a station, the procedural requirements of 39 U.S.C. § 404(d) do not apply because the discontinuance of the Lincoln Branch does not qualify as a closure envisioned by 39 U.S.C. § 404(d). As recognized in PRC Docket No. A2010-3, the section 404(d) procedural requirements apply only where postal customers lose access to postal services, and postal customers do not lose access to postal services where alternate retail facilities are located in "close

² As a courtesy, the final determination affecting the Lincoln Branch appears as Exhibit 1.

³ See, e.g., PRC Order No. 319 (October 19, 2009).

proximity” to the discontinued station. See Order No. 477, PRC Docket No. A2010-3 (June 22, 2010) at 7-8. Two other postal facilities are located within two miles of the Lincoln Branch. See Exhibit 2 (printout from “Locate a Post Office” on USPS.Com).⁴ And customers may obtain some postal services from expanded access options, including Stamps By Mail® and the four stamp consignment sites located within two miles of the Lincoln Branch. See Exhibit 3 (printout from “Locate a Post Office” on USPS.Com).⁵ Accordingly, due to the close proximity of other postal facilities, and the presence of expanded access options, the discontinuance of the Lincoln Branch 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
By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Pricing and Product Support

Kenneth N. Hollies
James M. Mecone

475 L'Enfant Plaza, S.W.
Washington, D.C. 20260-1137
(202) 268-6525; Fax -6187
February 23, 2011

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

⁵ 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 LINCOLN, OHIO CLASSIFIED FINANCE BRANCH
AND CONTINUE TO PROVIDE
RETAIL AND POST OFFICE BOX
SERVICE THROUGH THE MANSFIELD, OHIO MAIN POST OFFICE

DOCKET NUMBER 44905

I. RESPONSIVENESS TO COMMUNITY POSTAL NEEDS

The Postal Service has determined to close the Lincoln Finance Classified Branch and provide delivery and retail services at the Mansfield, Ohio Main Post Office, located 2 miles away. The post office box customers will be able to retain their address if they move to the Mansfield 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.

The Lincoln Finance Branch offers delivery and retail services to 295 post office box customers. The revenue has continued to decline and with the moderate number of retail transactions provided, the Postal Service feels that effective and regular service will continue to be provided through PO Box delivery service and retail service provided by the Mansfield Main Post Office. Additionally there are three post office locations and 7 stamp consignment locations within 5 miles of the Lincoln Branch.

The Lincoln Finance Classified Branch provides service 40 hours a week from 8:30 a.m. to 4:30 p.m., Monday through Friday, and closed on Saturday. The lobby hours are 24 hours Monday through Friday. 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 250. Office receipts for the last three years were: \$713,546 in FY-2007; \$694,209 in FY-2008 and \$629,826 in FY-2009. There are no permit mail customers.

When this final determination is implemented, retail services will be provided by the Mansfield Main Post Office. All operations will be moved to this location. Window service hours at Mansfield Main Post Office are from 7:30 a.m. to 6:00 p.m., Monday through Friday and 9:00 a.m. to 1:00 p.m. on Saturday and the lobby is open 24 hours Monday through Friday. There are 389 Post Office boxes available.

Retail service is also available at the Sherman Post Office located approximately 5 miles away. Window service hours at Sherman Post Office are from 8:30 a.m. to 4:30 p.m., Monday through Friday and closed on Saturday. Window service hours at Southwest Post Office are from 8:30 a.m. to 5:30 p.m. Monday through Friday and 9:00 a.m. to 1:00 p.m. on Saturday.

On July 14, 2009 questionnaires were distributed to PO Box delivery customers of the Lincoln Finance Branch. Questionnaires were also available over the counter for retail customers at Lincoln Finance Branch. Two hundred and forty-two questionnaires were returned. None was favorable, 83 were unfavorable, and 159 expressed no opinion regarding the proposed alternate service.

The following postal concerns were expressed on the returned questionnaires.

1. **Concern:** Customers expressed concern that the Mansfield Main Post Offices was not convenient for the customers living in the Madison Township.

Response: The Postal Service is proposing to move the post office box section to the Mansfield Main Post Office, since it has room to accommodate more boxes. We understand that the distance may cause an inconvenience for some customers. Thus customers also have the option of renting a post office box at the Sherman Post Office or Southwest Post Office, located approximately 5 miles away, retail service is available at these locations. Customers also have the option of city delivery service to their residence.

2. **Concern:** Customers expressed concern over the long lines at the Mansfield Main office.

Response: The Postal Service has a goal to keep customers wait time in line at 5 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 live busy

-2-

lives and we have taken steps to make obtaining services and products easier. Stamps by Mail envelopes are available at you local office. Customers can also purchase stamps by phone at (800) 782-6724 or through the internet at www.usps.com.

4. **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. Since there are 3 Post Offices within 5 miles and 7 stamps on consignment locations of the Lincoln Finance Branch, 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.

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

Response: Customers choosing post office box service at the Lincoln Finance Branch 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
MANSFIELD , OH 44905

Proposed Address:

JOHN DOE
100 MAIN ST
MANSFIELD, OH 44905

6. **Concern:** Customers expressed concern that postal employees at the Mansfield 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 complained about the parking lot of the Mansfield Main Post Office.

Response: The parking lot conditions at the Mansfield Main Post Office were brought to the attention of Administrative Services at the Northern Ohio District. The Mansfield parking lot has ample parking to accommodate an influx of their new customer base.

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 those customers 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.
7. Lincoln Finance Branch post office box customers fees will be decreased by moving to a lower fee group.

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 Mansfield 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 Mansfield Post Office is located two miles 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

Lincoln Finance Branch is located in the incorporated City of Madison Township. The area is administered politically by the City of Madison Township Trustees. Police and fire protection are provided by the Richland County Sheriff's Department and the Madison Township Fire Department. The community is comprised of residential customers and small businesses.

There are 131 stores, banks, religious institutions, and businesses located within the Lincoln Finance area. Residents travel to nearby communities for supplies and services.

The following non-postal concerns were expressed on the returned questionnaires:

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

Response: Carrier service is beneficial to many senior citizens and those who face special challenges. 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 Mansfield postmaster for more information.

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

Response: The Postal Reorganization Act requires the Postal Service to operate as a business. 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.

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

Response: Customers are not required to travel to another Post Office to receive mail or obtain retail services. 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 Mansfield postmaster.

4. **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 community name, address and ZIP Code in the *National Five-Digit ZIP Code and Post Office Directory*.

Based on information the Postal Service obtained, it was determined that there has been a -.02% decline in growth in the area in recent years. However, service through the Mansfield Main Post Office, and the other post offices and stamp consignees are 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 Mansfield 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 Mansfield installation and maintain bidding status within that office. No other employee will be adversely affected. The sales and service associates will become unassigned regulars and assigned to a residual vacancy within the Mansfield installation. If there are no residual vacancies, article 12 will be implemented.

IV. ECONOMIC SAVINGS

The Postal Service estimates annual savings of \$153,783 with a breakdown as follows:

| | |
|------------------------------------|---------------|
| Clerk Salary (PS-6, Minimum) | \$82,086 |
| Fringe Benefits @33.5% | \$27,498 |
| Inter-Station Transportation Costs | \$2,500 |
| Rental Costs, Plus Utilities | \$41,699 |
| Total Annual Costs | \$153,783 |
| Less Cost of Replacement Service | - 0 |
| Total Annual Savings | \$153,783 |

A one-time expense of \$74,897 will be incurred for rotary boxes 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 Lincoln Finance Branch and provide delivery and retail service through the Mansfield Main Post Office, located approximately 2 miles away. Post office box customers will have the option of retaining their post office box and number at the Mansfield Main Post Office, or closing the box and receiving carrier delivery service.

The Lincoln Finance Branch provides 40 hours of window service per week to 252 customers. Daily retail window transactions average 250. There are no permit mailers.

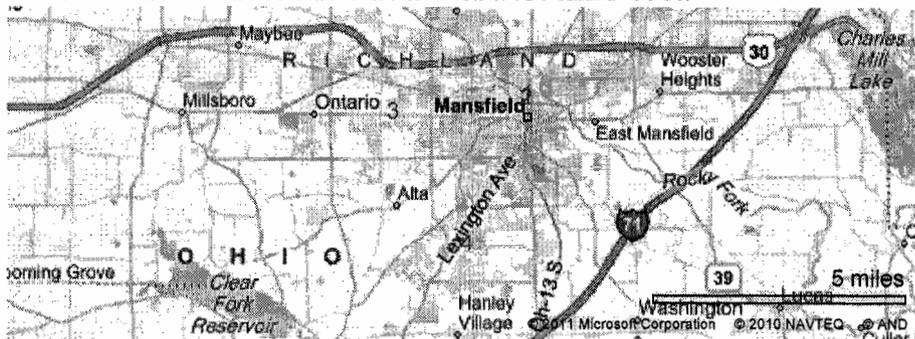
EXHIBIT 2



Post Office™ Locations

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

Post Office™ Locations in the MANSFIELD area



- | | | |
|---|---|---|
| <p>1 Post Office™ Location - MANSFIELD 200 N DIAMOND ST MANSFIELD, OH 44901-1006 (800) ASK-USPS (800) 275-8777 (419) 755-4621</p> <p style="border: 1px solid black; padding: 2px; display: inline-block;">2.0 mi</p> | <p>Business Hours Mon-Fri 7:30am-6:00pm Sat 9:00am-1:00pm Sun closed</p> | <p>Services Passport Application Services PO Boxes Online</p> <p>Service hours may vary. Please check link for business hours.</p> |
| <p>2 Post Office™ Location - ONTARIO 3656 PARK AVE W ONTARIO, OH 44862-9800 (800) ASK-USPS (800) 275-8777 (419) 529-2409</p> <p style="border: 1px solid black; padding: 2px; display: inline-block;">2.0 mi</p> | <p>Business Hours Mon-Fri 8:30am-12:00pm 1:15pm-4:45pm Sat 8:30am-11:30am Sun closed</p> | <p>Services PO Boxes Online</p> <p>Service hours may vary. Please check link for business hours.</p> |
| <p>3 Post Office™ Location - SHERMAN 1343 PARK AVE W MANSFIELD, OH 44906-9998 (800) ASK-USPS (800) 275-8777 (419) 529-3672</p> <p style="border: 1px solid black; padding: 2px; display: inline-block;">4.6 mi</p> | <p>Business Hours Mon-Fri 8:30am-4:30pm Sat-Sun closed</p> | <p>Services PO Boxes Online</p> <p>Service hours may vary. Please check link for business hours.</p> |

Business Hours **Services**

| | | |
|--|--|---|
| <p>4 Post Office™ Location - SOUTHWEST 672 1/2 LOGAN RD MANSFIELD, OH 44907-9998 (800) ASK-USPS (800) 275-8777 (419) 756-7222</p> | <p>Mon-Fri 8:30am-5:30pm Sat 9:00am-1:00pm Sun closed</p> | <p><u>PO Boxes Online</u> Service hours may vary. Please check link for business hours.</p> |
|--|--|---|

4.9 mi

Post Office™ Locations near MANSFIELD

By City

[ONTARIO](#) [LUCAS](#) [LEXINGTON](#) [ASHLAND](#) [BELLVILLE](#)

By ZIP Code

[44901](#) [44862](#) [44906](#) [44907](#) [44843](#) [44904](#) [44805](#) [44813](#) [44838](#) [44864](#)
[44875](#) [44822](#) [44827](#) [44878](#) [44848](#) [44874](#) [44840](#) [44842](#) [44833](#) [44837](#)

People and Business Search Find people and businesses at [WhitePages.com](#)

[People Search](#)

Search for a person and
 perform a reverse lookup
 on phone numbers and
 addresses.

[Business Search](#)

Search for a business by name or
 category nationwide.

[Reverse Phone Number](#)

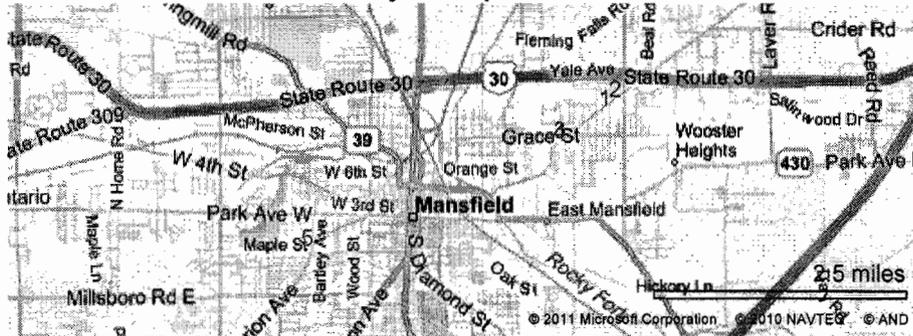
See who is calling you

EXHIBIT 3



Alternate Locations to Buy Stamps

Alternate Locations to Buy Stamps near 44905



- 1 KEYBANK** 0.0 mi [Directions](#)
 1001 ASHLAND RD [More info](#)
 MANSFIELD, OH [Nearby Businesses](#)
 44905-2156
- 2 KROGER** 0.2 mi [Directions](#)
 1060 ASHLAND RD [More info](#)
 MANSFIELD, OH [Nearby Businesses](#)
 44905-2157
- 3 CVS** 0.5 mi [Directions](#)
 751 ASHLAND RD [More info](#)
 MANSFIELD, OH [Nearby Businesses](#)
 44905-2075
- 4 WALGREENS** 0.6 mi [Directions](#)
 770 ASHLAND RD [More info](#)
 MANSFIELD, OH [Nearby Businesses](#)
 44905-2536
- 5 KEYBANK** 3.3 mi [Directions](#)
 345 MARION AVE [More info](#)
 MANSFIELD, OH [Nearby Businesses](#)
 44903-2063

Post Office™ Locations near 44905

By City

| ONTARIO | MANSFIELD | LUCAS | LEXINGTON | ASHLAND |
|---------|-----------|-------|-----------|---------|
|---------|-----------|-------|-----------|---------|

By ZIP Code

| | | | | | | | | | |
|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|
| 44901 | 44862 | 44906 | 44907 | 44843 | 44904 | 44805 | 44838 | 44813 | 44875 |
| 44864 | 44878 | 44827 | 44822 | 44874 | 44848 | 44840 | 44842 | 44833 | 44837 |

People and Business Search Find people and businesses at WhitePages.com

People Search

Search for a person and perform a reverse lookup on phone numbers and addresses.

Business Search

Search for a business by name or category nationwide.

Reverse Phone Number

See who is calling you

Copyright ©1996-2011 WhitePages.com. [Legal Notice](#) and [Terms](#)

[Yellow Pages](#), [White Pages](#), also nearby