

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

In the Matter of:

Pleasant Ridge Station
Little Rock, AR 72212
(Lou Schickel, Petitioner)

Docket No. A2011-8

NOTICE OF UNITED STATES POSTAL SERVICE
(March 2, 2011)

By means of Order No. 678 (February 23, 2011), the Postal Regulatory Commission docketed correspondence from a customer of Pleasant Ridge Station in Little Rock, Arkansas, assigning PRC Docket No. A2011-8 as an appeal pursuant to 39 U.S.C. § 404(d).¹ That Order, at page 3, set March 2, 2011 as the date by which “[t]he Postal Service shall file the administrative record regarding this appeal” or “any responsive pleading to this Notice.” This pleading responds to that directive.

The Postal Service notes that it does not have a final administrative record supporting the discontinuance of Pleasant Ridge Station that complies with the standards applicable to a Post Office discontinuance, as the Commission likely expects. The discontinuance of Pleasant Ridge Station does not require an official administrative record conforming to Post Office discontinuance standards because Pleasant Ridge Station is not a Post Office, and Commission jurisdiction under 39 U.S.C. § 404(d) does not attach.²

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

² As a courtesy, the final determination affecting Pleasant Ridge Station appears as Exhibit 1.

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 Pleasant Ridge Station's status as a station, the procedural requirements of 39 U.S.C. § 404(d) do not apply because the discontinuance of Pleasant Ridge Station 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 proximity" to the discontinued station. See Order No. 477, PRC Docket No. A2010-3 (June 22, 2010) at 7-8. One other postal retail facility is located within 1.5 miles of Pleasant Ridge Station, and an additional postal retail facility is

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

located within 2.5 miles of Pleasant Ridge Station. See Exhibit 2 (printout from “Locate a Post Office” on USPS.Com).⁴ Customers may obtain some postal services from expanded access options, including Stamps By Mail® and the five stamp consignment sites located within two miles of Pleasant Ridge Station. See Exhibit 3 (printout from “Locate a Post Office” on USPS.Com). Accordingly, due to the close proximity of other postal facilities, and the presence of expanded access options, the discontinuance of Pleasant Ridge Station will not cause postal customers to lose access to postal services and the section 404(d) procedures do not apply.

The Commission may wish to consider whether these events should become part of PRC Docket No. PI2010-1. But the Postal Service understands that Commission assertion of jurisdiction at this time does not appear able to benefit the situation, postal customers, or the Postal Service.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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March 2, 2011

⁴ Exhibits 2 and 3 use 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 PLEASANT RIDGE, AR CLASSIFIED STATION
AND CONTINUE TO PROVIDE RETAIL,
CITY DELIVERY AND POST OFFICE BOX
SERVICE THROUGH THE WESTSIDE, AR CLASSIFIED STATION

DOCKET NUMBER 72212

I. RESPONSIVENESS TO COMMUNITY POSTAL NEEDS

The Postal Service has determined to close the Pleasant Ridge Classified Station and provide post office box delivery and retail services at the Westside, AR Classified Station, located .53 miles away. The post office box customers will be able to retain their address if they move to the Westside Classified Station. 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 Pleasant Ridge Station will retain the same delivery; however, it will now originate out of the Westside Station. City Delivery customers will have to go to the Westside Station for packages and accountable items that the carrier was unable to deliver.

Retail transactions have declined at the Pleasant Ridge Station by approximately 2.8% since fiscal year 2008, while revenue has declined by approximately 5.7% for the same period. The Postal Service feels that regular and effective service will continue to be provided through the Pleasant Ridge Station. Additionally, there are 4 contract postal units, post offices, stations and branches located within 5 miles. In addition, there are also 30 alternate retail sites available within 5 miles.

The Pleasant Ridge Classified Station provides service 42½ hours a week from 8:45 a.m. to 5:00 p.m., Monday through Friday, and 10:30 a.m. to 12:00 p.m. on Saturday to 448 post office box and 5,607 city delivery customers. Retail services include the sale of stamps, stamped paper, and money orders; special services such as Registered, Certified, Insured, Delivery Confirmation, Signature Confirmation, COD, and Express Mail; and the acceptance and dispatch of all classes of mail. Daily retail window transactions average 332. Office receipts for the last three years were: \$771,339 in FY-2007; \$735,991 in FY-2008 and \$694,358 in FY-2009. There are no permit mail customers.

When this final determination is implemented, delivery and retail services will be provided by the Westside Station. All operations will be moved to this location. Window service hours at the Westside Station are from 9:00 a.m. to 6:00 p.m., Monday through Friday and 10:00 a.m. to 2:00 p.m. on Saturday. There are 579 Post Office boxes available. The Post Office Boxes from the Pleasant Ridge Station will be relocated to the Westside Station, there will be no fee increase, and customers will be able to use their current Post Office Box number and mailing address.

Retail service is also available at the Chenal Station, located approximately 2.4 miles away. Window service hours at Chenal Station are from 9:15 a.m. to 5:30 p.m. Monday through Friday and 9:00 a.m. to 1:00 p.m. on Saturday.

On November 12th and 13th, 2009, six thousand and forty four questionnaires were distributed to delivery customers of the Pleasant Ridge Station. Questionnaires were also available over the counter for retail customers at Pleasant Ridge Station. One thousand three hundred eighty two questionnaires were returned. One hundred sixty nine were favorable, eight hundred and eight were unfavorable, and four hundred and five expressed no opinion regarding the proposed alternate service.

Congressional inquiries were received on August 27, August 31, September 14, September 25 and November 23, 2009.

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

1. **Concern:** Customers expressed concern that the Westside Station was not convenient for the customers living in the Pleasant Ridge community.

-2-

Response: The Postal Service is proposing to move the post office box section to the Westside Station, 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 Chenal or Brady Finance Stations located approximately 2.4 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 that the consolidation would create long lines at the Westside Station.

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 lives and we have taken steps to make obtaining services and products easier. Stamps by Mail envelopes are available at your local office. Alternate locations to buy stamps are listed under "Locate a Post Office" at www.usps.com. Customers can also purchase stamps by phone at (800) 782-6724 or on-line at www.usps.com.

3. **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 is 1 contract postal unit and 3 Stations located within 5 miles of the Pleasant Ridge Station, 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. The Postal Service has taken steps to make obtaining services and products easier. Stamps by Mail envelopes are available at your local office. Alternate locations to buy stamps are listed under "Locate a Post Office" at www.usps.com. Customers can also purchase stamps by phone at (800) 782-6724 or on-line at www.usps.com.

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

Response: Customers choosing post office box service at the Westside Station 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.

5. **Concern:** Customers were concerned about a possible loss of friendly atmosphere provided by the clerks and carriers.

Response: Courteous and helpful service will be provided by the personnel at the Westside Station and from the carrier. Special assistance will be provided as needed.

6. **Concern:** Customers were concerned about the Pleasant Ridge Station employees being laid off as a result of the consolidation.

Response: Employees will not be laid off or terminated. Employees will be reassigned to surrounding postal facilities.

7. **Concern:** Customers were concerned about tax payer's money being wasted on a vacant facility.

Response: Pleasant Ridge Station is a leased facility. Money will be saved with the elimination of the lease.

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 service will be enhanced by improved customer parking and expanded service hours.
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 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 Westside Station is located .53 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

Pleasant Ridge Station is located in the incorporated City of Little Rock Arkansas. The area is administered politically by the City of Little Rock. Police and fire protection, are provided by the City of Little Rock. The community is comprised of approximately 185,000 citizens. The area surrounding the Pleasant Ridge Station is comprised of single family homes, shopping centers with small retail businesses. The Postal Service has 14 postal facilities located throughout the city of Little Rock.

There are numerous stores, banks, religious institutions, and businesses located in the Pleasant Ridge area.

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

-4-

1. **Concern:** Customers expressed concerned about the impact on neighboring businesses.

Response: Businesses generally require regular and effective postal services, and these will always be provided to the Pleasant Ridge community. There is no indication that the business community will be adversely affected. Questionnaire responses revealed that customers will continue to use local businesses.

Nonpostal services provided at the Pleasant Ridge Classified Station will be available at the Westside Station.

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 Westside Station, and the other 4 contract postal units, post offices, stations and branches within the area is expected to be able to handle any future growth in the community.

To help preserve community identity, the community's name and ZIP Code will be retained in the mailing address. No change of address will be required for customers choosing post office box service at the Westside Station.

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 Westside Station and maintain bidding status within that office. The EAS Manager will be reassigned to a vacant Manager position within the city of Little Rock. The supervisor will be slotted into the new supervisor position at the Westside Station, once the consolidation is completed. No other employee will be adversely affected.

IV. ECONOMIC SAVINGS

The Postal Service estimates annual savings of \$296,906 with a breakdown as follows:

EAS Manager Salary (EAS-19, Minimum)	\$46,691
Fringe Benefits @33.5%	15,641
Maintenance	13,107
Inter-Station Mail Transportation	142,739
Rental Costs, Plus Utilities	+ <u>\$136,235</u>
Total Annual Costs	\$354,413
Less Cost of Replacement Service	<u>-\$57,507</u>
Total Annual Savings	\$296,906

A one-time expense of \$621,780 will be incurred: \$488,256 for building modifications and \$133,524 for 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 Pleasant Ridge Station and provide retail and delivery services through Westside Station, located approximately .53 miles away. Post office box customers will have the option of retaining their post office box and number at the Westside Station, or closing the box and receiving carrier delivery service. Present carrier delivery customers will receive the same service with the exception of the carriers will be originating out of the Westside Station. Those customers will have to go to the Westside Station for packages and accountable items that the carrier was unable to deliver.

The clerks will be reassigned to the Westside Station and maintain bidding status within that office. The EAS Manager will be reassigned to a vacant Manager position within the city of Little Rock. The supervisor will be slotted into the new supervisor position at the Westside Station, once the consolidation is completed. No other employees will be adversely affected.

The Westside Station provides 42.50 hours of window service per week to 6,055 customers. Daily retail window transactions average 332. There are no permit mailers.

There will be a loss of a retail outlet in the area. However, Post Office Box and carrier service at the Westside Station will continue to provide effective and regular service. To help preserve identity, the name and ZIP Code will be retained in the mailing address. The Postal Service will save an estimated \$296,906 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 Pleasant Ridge Station and advise them of the hours of operation and services available at the Westside Station and the other stations, branches, and alternate retail located within a 5-mile radius.


Dean S. Granholm
Vice President
Delivery and Post Office Operations

01/05/11
Date

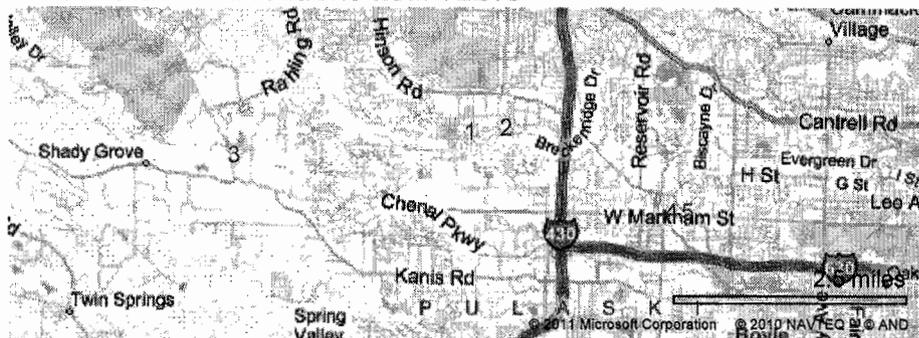
EXHIBIT 2



Post Office™ Locations

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

Post Office™ Locations near 72212



- | | | |
|--|---|---|
| <p>1 Post Office™
Location -
PLEASANT RIDGE
11619 PLEASANT
RIDGE RD
LITTLE ROCK, AR
72212-9998
(800) ASK-USPS

(800) 275-8777
(501) 225-4214

1.1 mi</p> | <p>Business Hours
Mon-Fri
8:45am-5:00pm
Sat
10:30am-12:00pm
Sun
closed</p> | <p>Services
PO Boxes Online

Service hours may vary. Please
check link for business hours.</p> |
| <p>2 Post Office™
Location -
WESTSIDE
11415 HURON LN
LITTLE ROCK, AR
72211-9998
(800) ASK-USPS

(800) 275-8777
(501) 225-2307

1.3 mi</p> | <p>Business Hours
Mon-Fri
9:00am-6:00pm
Sat
10:00am-2:00pm
Sun
closed</p> | <p>Services
PO Boxes Online
Automated Postal Centers®

Service hours may vary. Please
check link for business hours.</p> |
| <p>3 Post Office™
Location -
CHENAL STATION
815 TECHNOLOGY
DR
LITTLE ROCK, AR
72223-9998
(800) ASK-USPS

(800) 275-8777
(501) 821-6299

2.4 mi</p> | <p>Business Hours
Mon-Fri
9:15am-5:30pm
Sat
9:00am-1:00pm
Sun
closed</p> | <p>Services
PO Boxes Online

Service hours may vary. Please
check link for business hours.</p> |

4 Post Office™
Location - BRADY FINANCE
 8509 W MARKHAM ST
 LITTLE ROCK, AR 72205-2400
 (800) ASK-USPS
 (800) 275-8777
 (501) 219-2933
 3.2 mi

Business Hours
 Mon-Fri 8:00am-5:00pm
 Sat 10:00am-1:00pm
 Sun closed

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

5 Post Office™
Location - BRADY
 8313 W MARKHAM ST
 LITTLE ROCK, AR 72205-9998
 (800) ASK-USPS
 (800) 275-8777
 (501) 223-9934
 3.4 mi

Post Office™ Locations near 72212

By City

[MAUMELLE](#) [LITTLE ROCK](#) [MABELVALE](#) [NORTH LITTLE ROCK](#) [ROLAND](#)

By ZIP Code

[72211](#) [72223](#) [72205](#) [72207](#) [72113](#) [72204](#) [72114](#) [72209](#) [72210](#) [72201](#)
[72103](#) [72206](#) [72202](#) [72116](#) [72135](#) [72002](#) [72231](#) [72022](#) [72117](#) [72164](#)

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Business Search
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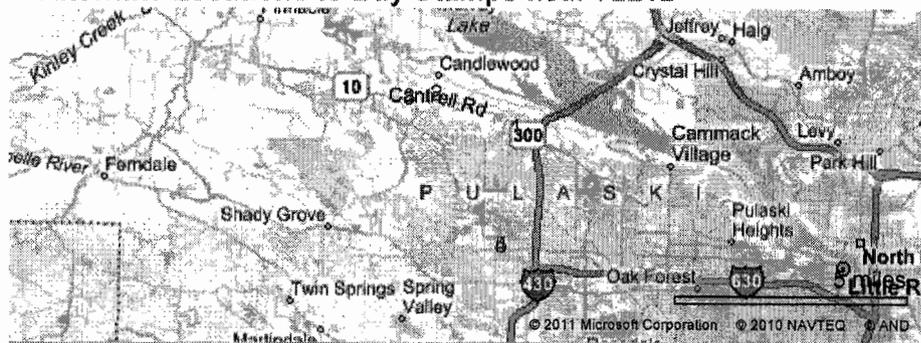
Reverse Phone Number
 See who is calling you

EXHIBIT 3



Alternate Locations to Buy Stamps

Alternate Locations to Buy Stamps near 72212



- | | | | |
|---|--|--------|--|
| 1 | METROPOLITAN NATIONAL BANK
4220 N RODNEY
PARHAM RD
LITTLE ROCK, AR
72212-2453 | 1.3 mi | Directions
More info
Nearby Businesses |
| 2 | KROGER
14000 CANTRELL RD
LITTLE ROCK, AR
72223-1526 | 1.6 mi | Directions
More info
Nearby Businesses |
| 3 | WALGREENS
14820 CANTRELL RD
LITTLE ROCK, AR
72223-4244 | 1.9 mi | Directions
More info
Nearby Businesses |
| 4 | US BANK
11402 W MARKHAM ST
LITTLE ROCK, AR
72211-2806 | 2.0 mi | Directions
More info
Nearby Businesses |
| 5 | OFFICE DEPOT
11400 W MARKHAM ST
LITTLE ROCK, AR
72211-2806 | 2.0 mi | Directions
More info
Nearby Businesses |

- Post Office™ Locations near 72212**
- By City
- | | | | | |
|----------|-------------|-----------|-------------------|--------|
| MAUMELLE | LITTLE ROCK | MABELVALE | NORTH LITTLE ROCK | ROLAND |
|----------|-------------|-----------|-------------------|--------|

By ZIP Code

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[72103](#) [72206](#) [72202](#) [72116](#) [72135](#) [72002](#) [72231](#) [72022](#) [72117](#) [72164](#)

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