

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

In the Matter of:
Mitchellville Post Office
Mitchellville, Tennessee

Docket No. A2011-9

UNITED STATES POSTAL SERVICE
COMMENTS REGARDING APPEAL
(April 19, 2011)

On February 23, 2011, the Postal Regulatory Commission (Commission) received an appeal postmarked February 19, 2011, from postal customer Larry D. Draper (Petitioner) objecting to the discontinuance of the Post Office at Mitchellville, Tennessee. On February 25, 2011, the Commission issued Order No. 682, its Notice and Order Accepting Appeal and Establishing Procedural Schedule under 39 U.S.C. § 404(d). The Commission received no additional written communications from customers of the Mitchellville Post Office. The Petitioner did not file a Form 61 or initial brief in support of the petition. In accordance with Order No. 682, the administrative record was filed with the Commission on March 10, 2011.

The appeal received by the Commission on February 23, 2011, raises three main issues: (1) the effect on postal services, (2) the impact upon the Mitchellville community, and (3) the calculation of economic savings expected to result from discontinuing the Mitchellville Post Office. As reflected in the administrative record of this proceeding, the Postal Service gave these issues serious consideration. In addition, consistent with the Postal Service's statutory obligations and Commission

precedent,¹ the Postal Service gave consideration to a number of other issues, including the impact upon postal employees. Accordingly, the determination to discontinue the Mitchellville Post Office should be affirmed.

Background

The Final Determination To Close the Mitchellville, TN Post Office and Extend Rural Route Service (FD), as well as the administrative record, indicate that the Mitchellville Post Office provides EAS-C level service to 18 Post Office Box customers, 8 general delivery customers, and retail customers 22 hours per week. FD at 1; Item No. 13, (Form 4920) Post Office Closing or Consolidation Proposal Fact Sheet (“Fact Sheet”), at 1.² The postmaster of the Mitchellville Post Office was promoted on June 25, 2005. A noncareer employee from a neighboring office was installed as the temporary officer-in-charge (OIC). Upon implementation of the final determination, the noncareer OIC will return to her position at a nearby office.³ The average number of daily retail window transactions at the Mitchellville Post Office is six. Revenue has generally been low: \$9,680.00 in FY 2008 (26 revenue units); \$7,845.00 in FY 2009; and \$9,069.00 in FY 2010.⁴ The Mitchellville Post Office has no meter or permit customers. FD at 1; Item No. 13, Fact Sheet, at 1; Item No. 29, Proposal, at 2, 10.

Upon implementation of the final determination, delivery and retail services will be provided by rural route delivery administered by the Portland Post Office, an EAS-20

¹ See 39 U.S.C. 404(d)(2)(A).

² In these comments, specific items in the administrative record are referred to as “Item ____.”

³ FD, at 1, 6-7; Item No. 16, Letter to Postal Customer from Manager, Post Office Operations (“Letter to Customer”), at 1; Item No. 29, Proposal to Close the Mitchellville, TN Post Office and Continue to Provide Rural Route Service (“Proposal”), at 5, 13.

⁴ FD, at 1; Item No. 13, Fact Sheet, at 1-2; Item No. 29, Proposal, at 2, 10.

level office located five miles away, which has 300 available Post Office Boxes. FD at 1; Item No. 13, Fact Sheet, at 1; Item No. 29, Proposal, at 2, 5, 10, 13. This service will continue upon implementation of the FD. FD at 1.

The Postal Service followed the proper procedures which led to the posting of the FD. All issues raised by the customers of the Mitchellville Post Office were considered and properly addressed by the Postal Service. The Postal Service complied with all notice requirements. In addition to the posting of the Proposal and FD, customers received notice through other means. Questionnaires were distributed to delivery customers of the Mitchellville Post Office. Questionnaires were also available over the counter for retail customers at Mitchellville. FD at 1; Item No. 15, Questionnaire Instruction Letter from P.O. Review Coordinator to OIC/Postmaster at Mitchellville Post Office, at 1. A letter from the Manager of Post Office Operations, Nashville, TN was also made available to postal customers, which advised customers that the Postal Service was evaluating whether the continued operation of the Mitchellville Post Office was warranted, and that effective and regular service could be provided through rural route delivery and retail services available at the Portland Post Office. The letter invited customers to complete and return a customer questionnaire and to express their opinions about the service they were receiving and the effects of a possible change involving rural route delivery. Item No. 16, Letter to Customer, at 1. The returned customer questionnaires and Postal Service response letters appear in the administrative record in Item No. 17. In addition, representatives from the Postal Service were available at the Mitchellville Post Office for a community meeting on

August 11, 2009, to answer questions and provide information to customers. FD at 1; Item No. 16, Letter to Customer, at 1; Item No. 19, Community Meeting Roster; Item No. 20, Community Meeting Analysis; Item No. 29, Proposal, at 2, 10. Customers received formal notice of the Proposal and FD through postings at nearby facilities. The Proposal was posted with an invitation for public comment at the Mitchellville Post Office and the Portland Post Office from September 17, 2010 to November 20, 2010. FD, at 5; Item No. 29, Proposal, at 1, 8, 9, 16. The FD was posted at the same two Post Offices starting on January 24, 2011, as confirmed by the round-dated FD cover sheets that appear in the administrative record.

In light of the postmaster vacancy, a minimal workload, low office revenue,⁵ the variety of delivery and retail options (including the convenience of rural delivery and retail service),⁶ very little recent growth in the area,⁷ minimal impact upon the community, and the expected financial savings,⁸ the Postal Service issued the FD.⁹ Regular and effective postal services will continue to be provided to the Mitchellville community in a cost-effective manner upon implementation of the final determination. FD at 1.

Each of the issues raised by the Petitioner is addressed in the paragraphs which follow.

⁵ See note 4 and accompanying text,

⁶ FD, at 4-5; Item No. 29, Proposal, at 2-4, 10-12.

⁷ FD, at 6; Item No. 11, Community Survey Sheet; Item No. 29, Proposal, at 5, 13.

⁸ FD, at 5-7; Item No. 12, Cost Analysis; Item No. 13, Fact Sheet, at 1; Item No. 23, Proposal Checklist, at 2; Item No. 29, Proposal, at 5, 13.

⁹ FD, at 5-7.

Effect on Postal Services

Consistent with the mandate in 39 U.S.C. § 404(d)(2)(A)(iii) and as addressed throughout the administrative record, the Postal Service considered the effect of closing the Mitchellville Post Office on postal services provided to Mitchellville customers. The closing is premised upon providing regular and effective postal services to Mitchellville customers.

The Petitioner, in his letter of appeal, raises the issue of the effect on postal services of the Mitchellville Post Office's closing, noting the convenience of the Mitchellville Post Office and requesting its retention. The Petitioner expresses particular concern about the limited hours of operation at the Post Office and the effect of the closing of the Mitchellville Post Office on the shipping of packages. Each of these concerns was considered by the Postal Service.

The Mitchellville Post Office has reduced hours because of the lack of mail volume and window transactions at the Mitchellville Post Office. Item No. 29, Proposal, at 2-3, 10-11. The Postal Service determines postmaster level and Post Office service hours by analyzing the workload of a Post Office. The Mitchellville office qualifies for 24 hours of service weekly to 18 Post Office Box and 8 general delivery customers. FD, at 1; Item No. 5, Worksheet for Calculating Workload Service Credit. The Mitchellville Post Office has an average of six daily retail window transactions. Item No. 6, Window Transaction Survey. Upon the implementation of the final determination, delivery and retail services will be provided by rural route delivery emanating from the Portland Post Office. The window service hours of the Portland Post Office are from 8 a.m. to 4:30

p.m., Monday through Friday and 9 a.m. to 12 noon on Saturday. FD, at 1. In addition, customers opting for carrier service will have 24-hour access to their mail. FD, at 4.

The effect of the closing of the Mitchellville Post Office on the shipping of packages was considered extensively by the Postal Service. FD at 1; Item No. 29, Proposal, at 2, 10. Upon the implementation of the Final Determination, service will be provided to cluster box units (CBUs) installed on the carrier's line of travel, so that customers do not have to make a special trip to the Post Office for service. FD at 1-3. CBUs provide the security of individually locked mail compartments. Parcel lockers provide convenient parcel delivery for customers. FD, at 2, 5. Various options exist for the shipping of packages, which are explained on www.usps.com. If internet access is available, the Postal Service's Click-N-Ship service enables customers to print shipping labels with postage for Express Mail and Priority Mail. FD, at 1. Carrier pickup is available, which allows for scheduling the pickup of packages at the same time the carrier delivers the mail. Item No. 18, Postal Customer Questionnaire Analysis, at 1; Item No. 29, Proposal, at 2, 3, 10, 11. In addition, the Portland Post Office can provide answers to questions about possible options for the shipping of packages from a Mitchellville address.

The Postal Service has considered the impact of closing the Mitchellville Post Office upon the provision of postal services to Mitchellville customers. Rural route delivery to CBUs installed on the carrier's line of travel provides similar access to retail service, alleviating the need to travel to the Post Office. FD at 1-2, 4; Item No. 18, Postal Customer Questionnaire Analysis, at 1; Item No. 29, Proposal, at 2-4, 6, 10-12,

14. Thus, the Postal Service has properly concluded that all Mitchellville customers will continue to receive regular and effective service via rural route delivery to CBUs installed on the carrier's line of travel.

Effect Upon the Mitchellville Community

The Postal Service is obligated to consider the effect of its decision to close the Mitchellville Post Office upon the Mitchellville community. 39 U.S.C. § 404(d)(2)(A)(i). While the primary purpose of the Postal Service is to provide postal services, the statute recognizes the substantial role in community affairs often played by local Post Offices, and requires consideration of that role whenever the Postal Service proposes to close or consolidate a Post Office.

Mitchellville is an incorporated rural community located in Sumner County. The Sumner County Sheriff's Department provides police protection. The community is administered politically by a mayor and council form of government, with fire protection provided by the Mitchellville Volunteer Fire Department. A number of churches are located in the Mitchellville community. FD, at 5; Item No. 29, Proposal at 4, 12. The questionnaires completed by Mitchellville customers indicate that, in general, the retirees, farmers, commuters, and others who reside in Mitchellville must travel elsewhere for other supplies and services. See generally FD at 5; Item No. 17, Returned customer questionnaires and Postal Service response letters, at 5, 8, 11, 14, 17, 20, 23, 29, 35, 41, 44, 50.

The Petitioner's letter of appeal raises the issue of the effect of the closing of the Mitchellville Post Office upon the Mitchellville community. This issue was extensively

considered by the Postal Service, as reflected in the administrative record. FD, at 5- 6; Item No. 29, Proposal. The Postal Service explained that a community's identity derives from the interest and vitality of its residents and their use of its name. Item No. 29, Proposal, at 2, 10. Communities generally require regular and effective postal services and these will continue to be provided to the Mitchellville community. Carrier service is expected to be able to handle any future growth in the community. FD, at 6, Item No. 29, Proposal, at 5, 13. The Postal Service noted that residents may continue to meet informally, socialize, and share information at the other businesses, churches and residences in town. FD, at 6; Item No, 29, Proposal, at 3, 11.

The Petitioner expresses concern that the Mitchellville Post Office is a landmark. That the Mitchellville Post Office plays a role in the community other than just providing postal services, and is perceived as a landmark, was considered by the Postal Service. FD at 6-7; Item No. 11, Community Survey Sheet, at 1; Item No. 18, Postal Customer Questionnaire Analysis, at 1-2. The Postal Service explained that a community's identity derives from the interest and vitality of its residents and their use of a community name. Item No. 29, Proposal, at 2, 10; Item No. 31, Returned Optional Comment Forms and USPS Response letters, at 2, 6, 8, 11; Item No. 32, Analysis of 60-Day Posting Comments, at 1. The record makes clear that the Postal Service is addressing this concern through preservation of the community identity by continuing the use of the Mitchellville name and ZIP Code in addresses. FD at 6-7; Item No. 29, Proposal, at 5, 13; Item No. 31, Returned Optional Comment Forms and USPS

Response letters, at 2, 6, 8, 11; Item No. 32, Analysis of 60-Day Posting Comments, at 1.

In addition, the Postal Service has concluded that nonpostal services provided by the Mitchellville Post Office can be provided by the Portland Post Office. Government forms usually provided by the Post Office are also available by contacting local government agencies. FD at 6; Item No. 29, Proposal, at 5, 13.

Thus, the Postal Service has met its burden, as set forth in 39 U.S.C. § 404(d)(2)(A)(i), by considering the effect of closing the Mitchellville Post Office on the community served by the Mitchellville Post Office.

Economic Savings

Postal officials also properly considered the economic savings that would result from the proposed closing, as provided under 39 U.S.C. § 404(d)(2)(A)(iv). The Postal Service estimates that rural route carrier service would cost the Postal Service substantially less than maintaining the Mitchellville Post Office and would still provide regular and effective service. Item No. 16, Letter to Customer, at 1. The estimated annual savings associated with discontinuing the Mitchellville Post Office are \$21,142.00. FD at 6; Item No. 29, Proposal, at 13.

The Petitioner's letter of appeal suggests various strategies that he thinks would increase business or reduce cost at the Mitchellville Post Office. The Postal Service has broad experience with and has considered similar options; but, the Postal Service has determined that rural route service is the most cost-effective solution for providing regular and effective service to the Mitchellville community.

Economic factors are one of several factors that the Postal Service considered, and economic savings have been calculated as required for discontinuance studies, which is noted throughout the administrative record, consistent with the mandate in 39 U.S.C. § 404(d)(2)(A)(iv). FD, at 6; Item No. 29, Proposal, at 13.

Increasing the business hours of the Mitchellville Post Office would lead to an increase in costs. There is little evidence in the administrative record, however, to support the claim that increasing the Mitchellville Post Office business hours would lead to additional revenue which would exceed cost increases attributed to such longer business hours. As stated earlier, the Mitchellville Post Office, an EAS-C level, provides 22 hours a week to 18 Post Office Box and 8 general delivery customers. Daily retail window transactions average six. There are no permit mailers or postage meter customers. FD, at 1.

Providing all Mitchellville residents with a ZIP Code 37199 mailing address would likely not change or decrease the cost to the Postal Service of providing effective and regular service to residents, because the Postal Service already provides service to residents. Furthermore, according to the administrative record, minimal growth is expected. Item No. 11, Community Survey Sheet, at 1.

The Postal Service determined that carrier service is more cost-effective than maintaining the Mitchellville postal facility and postmaster position. FD, at 5. The Postal Service's estimates are supported by record evidence, in accordance with the Postal Service's statutory obligations. The Postal Service, therefore, has considered the economic savings to the Postal Service resulting from such a closing, consistent

with its statutory obligations and Commission precedent. See 39 U.S.C. § 404(d)(2)(A)(iv).

Effect on Employees

As documented in the record, the impact on postal employees is minimal. The postmaster was promoted on June 25, 2005. A noncareer employee from a neighboring office was installed as the temporary officer-in-charge (OIC). Upon implementation of the final determination, the noncareer OIC will return to her position at a nearby post office. The record shows that no other employee would be affected by this closing. FD, at 1, 6, 7; Item No. 10, Post Office Survey Sheet, at 1; Item No. 29, Proposal, at 2, 5, 10, 14. Therefore, in making the determination, the Postal Service considered the effect of the closing on the employees at the Mitchellville Post Office, consistent with its statutory obligations. See 39 U.S.C. § 404(d)(2)(A)(ii).

Conclusion

As reflected throughout the administrative record, the Postal Service has followed the proper procedures and carefully considered the effect of closing the Mitchellville Post Office on the provision of postal services and on the Mitchellville community, as well as the economic savings that would result from the proposed closing, the effect on postal employees, and other factors, consistent with the mandate of 39 U.S.C. § 404(d)(2)(A).

After taking all factors into consideration, the Postal Service determined that the advantages of discontinuance outweigh the disadvantages. In addition, the Postal Service concluded that after the discontinuance, the Postal Service will continue to

provide effective and regular service to Mitchellville customers. FD, at 7. The Postal Service respectfully submits that this conclusion is consistent with and supported by the administrative record and is in accord with the policies stated in 39 U.S.C. § 404(d)(2)(A). The Postal Service's decision to close the Mitchellville Post Office should, accordingly, be affirmed.

The Postal Service respectfully requests that the determination to close the Mitchellville Post Office be affirmed.

Respectfully submitted,

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