

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, DC 20268

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<i>In the Matter of:</i>	:	
Fort Smith Rogers Ave. Station	:	
Fort Smith, AR 72913	:	
(Kelly A. Procter-Pierce, Petitioner)	:	
	:	Docket No. A2011-13
Robert Canaday, Intervenor	:	

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**PARTICIPANT STATEMENT**

1. Intervenor is appealing the Postal Service's Final Determination concerning the closing of the Fort Smith Rogers Avenue Station in Fort Smith. The Final Determination was filed on January 5, 2011.

2. In accordance with applicable law, I request the Postal Regulatory Commission to review the Postal Service's determination on the basis of the record before the Postal Service in the making of the determination and all appeals and papers filed with the Commission since January 5, 2011.

3. I reside in Fort Smith, Arkansas, and am co-owner of BMC Letter Service, Inc. My current mailing address is PO Box 3234, Fort Smith, AR 72913.

4. I receive most of my personal mail and all of my business mail at PO Box 3234, Fort Smith, Arkansas. I have maintained this post office box for about nineteen (19) years. I am being negatively impacted by the closing of the postal station at 3400 Rogers Avenue, Fort Smith, AR 72913.

5. The Rogers Avenue station is located in close proximity to my home and to my business, as well as most shopping, pharmacy and banking. When I rented the post office box, I did so to maintain better security for important documents coming to me personally, such as bank statements and bills, and to keep the large amount of business mail I receive on a daily basis from coming to my home. I do not feel secure in having some important personal documents delivered to my home and left in the mailbox there when I am away from my home during the day. Having the post office box provides me with that security.

6. The Rogers Avenue station location is close to the center of town. The other locations that are now available are all, for the most part, on the perimeters of the city – to the north, east, west and south. Going to any of these locations forces me to drive a longer distance both ways, on a daily basis, since this still involved my business, which is incurring more costs to me personally and to my business, both in wear and tear on my vehicle and in gasoline expense. Any personal business that is done on a

daily basis is done within about a mile of my home. Some weekly personal shopping is done further away, but a weekly trip to the post office to collect and drop off mail is simply not an option.

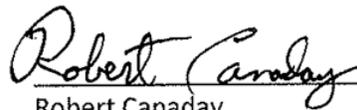
7. The Postal service is relying on census figures for the City of Fort Smith that are outdated, thus making the decision to close the Rogers Avenue facility flawed and casts doubts on their stated response to the effect the community. In the first paragraph Under Part II of Exhibit 1, Final Determination to Close the Fort Smith Rogers Ave. AR Classified Station, etc., the Postal Service states: "The community is comprised of approximately 54,000 citizens." And further, "... there has been minimal growth in the area in recent years." This is gross error on the part of the Postal Service in their survey and collection of data. The 2010 population census of Fort Smith was reported to be 86,209 (see <http://www.thecitywire.com/index.php?q=node/14521>) and is the second largest city in the state of Arkansas. The 2000 population was 80,286 (see <http://quickfacts.census.gov/qfd/states/05/0524550.html>). That is a 7.4% increase in population in the last 10 years, and is a 63% difference in what the Postal Service reported in its findings. If the Postal Service is using an outdated population figure of 54,000 citizens, then they are choosing to overlook almost 40% of the City as a whole. With the population figure not credible, the credibility of other numbers in the study must be questioned.

8. Under Part VI Summary, the Postal Service indicates that the clerks from the Rogers Avenue station will be reassigned to the Downtown Station and will be able to maintain bidding status. In reality, the move has been to the General Mail Facility instead of the Downtown station. If the clerks are being re-assigned, then the detail of economic savings in Part IV is in error and the stated total annual savings of \$96,386 is grossly inflated. Further, according to the **POSTAL NEWS** issued February 1, 2011, "... Affected postal employees will be reassigned in accordance with applicable collective bargaining agreements and established repositioning processed." Therefore, no savings in labor costs will be achieved by the closing of the Rogers Avenue station, leaving the purported 'savings' in question as to its validity.

9. The Downtown facility is closer to my home, but the location is difficult for vehicular traffic to maneuver in and out of, being a single way in and the same way out, which is opposite to most traffic coming toward it. It can and does become quite congested. The next alternate location mentioned of the Midland Station is not a viable option for me as I have no business or personal interests on that side of town. The same applies to the Fianna Hills station to the South. The actual re-location of the post office boxes to the General Mail Facility to the east has more than doubled my driving, both in time and in distance between my home and the Post office, which is creating an economic hardship for me.

10. Regarding the wait time, I have been to the General Mail Facility both before and after the closing of the Rogers Avenue station, and at all times I have experienced a significantly longer wait time at the General Mail Facility as opposed to the Rogers Avenue station. The line has been and still is generally out the door and into the main lobby at almost any time of the day I have been there, with only one or two clerks working the windows. Other windows are available but are not manned.

I respectfully request that the Commission remand the issue of closing the Rogers Avenue Station to the Postal Service for review under the actual facts and the issues at hand.



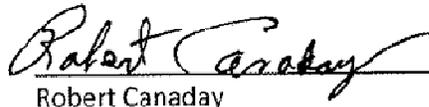
Robert Canaday  
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Fort Smith, AR 72913  
479-785-1060

CERTIFICATE OF SERVICE

I, Robert Canaday, do hereby certify that I have served a copy of the above by hand delivery or by first class regular U.S. Mail on this 28th day of April, 2011, upon the following:

Kelly A. Procter-Pierce, Petitioner  
PO Box 3405  
Fort Smith, AR 72913

Juanita Clark, Intervenor  
PO Box 5416  
Fort Smith, AR 72913



Robert Canaday

Submitted electronically to the Postal Regulatory Commission the 2<sup>nd</sup> of May, 2011.