

UNITED STATES OF AMERICA
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Before Commissioners:

Ruth Y. Goldway, Chairman;
Mark Acton, Vice Chairman;
Dan G. Blair;
Tony L. Hammond; and
Nanci E. Langley

Mitchellville Post Office
Mitchellville, Tennessee

Docket No. A2011-9

COMMENTS OF THE PUBLIC REPRESENTATIVE

(June 15, 2011)

I. Summary of Proceedings

The Commission received a petition for review of the closing of the Mitchellville Post Office located in Mitchellville, Tennessee. The petition, which was filed by Larry D. Draper (Petitioner), is postmarked February 18, 2011, and was posted on the Commission's website on February 23, 2011.¹ In Order No. 682 the Commission instituted a proceeding under 39 U.S.C. 404(d)(5), designated the case as Docket No. A2011-9 to consider the Petitioner's appeal and designated the undersigned as Public Representative.²

The Petitioner raises the issue of whether the Postal Service failed to consider the effect on the community of the closing of the Mitchellville, Post Office. See 39 U.S.C. 404(d)(2)(A)(i).

¹ Letter Received from Larry D. Draper Regarding the Closure of the Mitchellville Post Office, February 23, 2011 (Petition).

² Notice and Order Accepting Appeal and Establishing Procedural Schedule, February 25, 2011 (Order No. 682).

The Mitchellville Post Office was scheduled to close approximately February 25, 2011. The Petitioner stated that during his residency in Mitchellville, the post office hours have been reduced and the number of customers have declined. Petition at 1. He contends that certain residents within the city limits do not have Mitchellville mailing addresses and that these residents would be additional customers if the Postal Service would change their post office assignment. The Petitioner also requests consideration of additional post office boxes in the community. *Id.* He notes that the Mitchellville Post Office is one of the oldest post offices in Tennessee and is unique in its historical background. He contends that without the Mitchellville Post Office location, as a local business owner who ships packages using various Postal Service shipping services he would pursue shipping with Postal Service competitors. *Id.* The Petitioner also offers suggestions for products that may promote additional business. Finally, he suggests that the owner of the Mitchellville Post Office is willing to defer rental payments for a year to allow the facility to remain open for reconsideration of the closure proposal. The Petitioner filed no further comments or brief.

The deadline established for the Postal Service to file the administrative record with the Commission was March 10, 2011. 39 CFR 3001.113. On March 10, 2011, the Postal Service filed the administrative record in the instant appeal.³ On April 19, 2011 the Postal Service filed its comments.

II. Discussion

The Postal Service argues in its comments that it has addressed the issues raised by the Petitioner.⁴ It asserts that the three issues in the petition are: (1) the effect on postal services, (2) the impact of the closing on the Mitchellville community and (3) the calculation of economic savings expected to result from continuing the discontinuance of the Mitchellville Post Office. *Id.* at 1.

Effect on Postal Services. The Postal Service's Comments, supported by the Administrative Record, provide a summary of the information related to the closure of

³ United States Postal Service Notice of Filing, March 10, 2011.

⁴ United States Postal Service Comments Regarding Appeal, April 19, 2011 (Postal Service Comments).

the Mitchellville Post Office. The Postal Service responds to the Petitioner's concern about reduction in services at the Mitchellville Post Office by explaining the service standard for the location and changes in the number of transactions. *Id.* at 5. The Postal Service states that the reduction in hours of service resulted from the lack of mail volume and window transactions. It contends that the administrative record indicates that the Mitchellville Post Office had an average of 6 daily window transactions. *Id.* at 5.⁵ The Postal Service states that it assesses postmaster level and Post Office service hours based on an analysis of the workload of the Post Office. Because of its workload the Mitchellville Post Office only qualified for 24 hours of service to 18 Post Office Boxes and 8 general delivery customers. *Id.*

The Postal Service argues that the alternative service gives customers access to retail and rural route delivery services from the Portland Post Office that is approximately five miles away. It states that there are more window service hours at the Portland Post Office. The Postal Service states that the customers that choose carrier delivery will receive 24 hour access to their mail. *Id.* at 6. Additionally, rural route delivery is available to customers with cluster box units, which can be used for retail services making a trip to the post office unnecessary. *Id.*

The administrative record supports the use of the Portland Post Office. It indicates that the Mitchellville community will actually have more retail hours available at the Portland Post Office than it had at the Mitchellville Post Office. The Mitchellville Post Office was open from 9:00 a.m. to 11 a.m. and noon to 2 p.m., Monday through Friday and 1:00 p.m. to 3:00 p.m. on Saturday. The Portland Post Office hours are from 8:00 a.m. to 4:30 p.m., Monday through Friday and 9:00 a.m. to 12 noon on Saturday.⁶

The distance of the Portland Post Office is a concern. The Portland Post Office is approximately 5 miles away. However, the rural nature of the area means that post office locations may be further apart than in some urban areas. Because the Postal Service in this case is providing rural carrier delivery, and the use of cluster box units, it

⁵ Administrative Record, Item No. 6, Window Transaction Survey.

⁶ Final Determination to Close The Mitchellville, TN Post Office and Extend Route Service, December 28, 2010 (Final Determination).

appears reasonable to accept the Portland Post Office location. However, Postal Service management should follow up in this community to determine that senior citizens and persons with disabilities are receiving proper service or assistance as necessary from the Portland Post Office.

The Postal Service maintains that it has given consideration to the special concerns of shippers such as the Petitioner. Comments at 6. It asserts that shippers have various options including cluster box units installed on carrier routes that provide secure, locked compartments, Click N-Ship service that allows printing labels for Express Mail and Priority Mail and other carrier and package options provided on the Postal Service's web site. *Id.*

Economic savings. The Postal Service estimates that the projected savings from closure of the Mitchellville Post Office amounts to \$21,142. In spite of options cited by the Petitioner, the Postal Service has determined that rural route service provides the most viable economic alternative to provide regular and effective service to the Mitchellville community. The Public Representative agrees that the Postal Service will save money by the closure of this location. The Petitioner's suggestion to increase the types of products offered is not supported by any evidence that this will result in increased revenue that will exceed the cost of implementing the changes. Petitioner's suggestion to extend hours at the Mitchellville location may result in some additional revenue. However, a small increase in sales likely will not fuel the type of revenue necessary to justify the personnel cost required for extended hours. The revenue at the Mitchellville Post Office has not been increasing, appears inconsistent, and has shown some decline. The record shows that revenue was \$8,566 in 2007, \$9,680 in FY 2008, \$7,8450 in FY2009 and \$9,069 in FY2010. *Id.* at 2.

Effect on community. In its comments, the Postal Service discusses that a community's identity emanates from the interest and vitality of its residents and the use of a community name. *Id.* at 8. It states that it will continue the use of the Mitchellville name and the ZIP Code in addresses. The Postal Service has also complied with providing notice in conformity with 39 U.S.C. 404(d). It submitted questionnaires to customers by letter on July 29, 2009 and met with members of the community on

August 11, 2009 to answer questions and provide information on the closing. See Administrative Record, item 16, page 1. A total of 24 questionnaires were distributed and 16 returned with none favorable to the proposal, 10 unfavorable, and 6 expressing no opinion. The administrative record and final determination demonstrate that the Postal Service has taken the impact of the loss of the post office under consideration. The meeting with the community and responses to their concerns indicate that adequate consideration was given to community concerns.

The Postal Service has determined the cumulative result of all factors to be considered in the instant case make closure the best option for the community to receive regular and effective postal services.

The review of the record indicates that the most significant impact for customers in the instant case is the effect on the community of loss of its beloved post office. Customers noted things important to them such as the personal assistance provided by the postmaster in handling the purchase of a money order or the postmaster reading mail to them that they could not read or did not understand. Another customer notes that, "the post office is in front and winter tobacco is stripped in the back." The loss of these small rural facilities is certain to become a tale of lament on the loss of the unique aspects of American culture.

The Petitioner and others citizens of the community view its post office as a reflection of its recognition as a distinct and valuable community. The federal government provided support for this view simply with its establishment of the Mitchellville Post Office. The loss of the community's post office as a unique feature may appear idiosyncratic, but the closure of the Mitchellville Post Office is representative of the fate of communities across the nation that have or will lose their historical treasures in the effort to balance the Postal Service's financial condition.

Conclusion. The Postal Service has complied with consideration of the effect on the community. 39 U.S.C. 404(d)(2)(i). It has demonstrated that it may continue to provide regular and effective postal services to the community. With maintenance of the Postal Service as the goal the public is ultimately served by the resulting savings

however small that cumulatively may assist in the Postal Service reducing its massive debt.

Respectfully Submitted,
/s/ Cassandra L. Hicks
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